

**NATIONAL PREPAREDNESS
FOR
RESPONSE EXERCISE PROGRAM
(PREP)
GUIDELINES**

**DEPARTMENT OF HOMELAND SECURITY
U.S. Coast Guard**



**DEPARTMENT OF TRANSPORTATION
Pipeline and Hazardous Materials Safety Administration**



ENVIRONMENTAL PROTECTION AGENCY



**DEPARTMENT OF THE INTERIOR
Bureau of Safety and Environmental Enforcement**



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3 To the "Response Community":

4 This is the third revision since August 1994 to the Preparedness for Response
5 Exercise Program (PREP), when we set out together to design an effective and
6 coordinated exercise program under the Oil Pollution Act of 1990. As before, the
7 revisions are the result of an open dialogue and the incorporation of lessons learned
8 over the past 19 years. We considered issues identified in written comments received
9 by the Department of Homeland Security in response to regulatory docket ID: BSEE-
10 2014-0003, which announced the upcoming revision. The PREP will evolve as
11 Government and industry continue to meet the challenge of protecting public health,
12 welfare, and the environment. We look forward to working with all parties as we
13 continue to improve the PREP process.

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2 These PREP Guidelines are not a substitute for applicable legal requirements and are
3 not regulations. Although agency regulations state that compliance with the PREP
4 Guidelines will satisfy certain legal requirements, you are not required to use the PREP
5 Guidelines to satisfy those requirements: you may choose an alternative approach if the
6 approach satisfies the requirements of applicable statutes and regulations.

7 Some of the regulatory requirements discussed in this document involve collections of
8 information. An agency may not conduct or sponsor, and a person is not required to
9 respond to, an information collection that does not display a currently valid Office of
10 Management and Budget (OMB) control number. OMB control numbers for regulatory
11 requirements generally are found in each agency's regulations or *Federal Register*
12 notices. For example:

13 Bureau of Safety and Environmental Enforcement oil spill response requirements for
14 facilities located seaward of the coastline are covered by OMB control number
15 1014-0007.

16 Coast Guard vessel and facility response planning requirements, including exercise
17 requirements, are covered by OMB control number 1625-0066.

18 Pipeline and Hazardous Materials Safety Administration requirements are covered by
19 OMB control number 2137-0589.

20 Environmental Protection Agency requirements are covered by OMB control number
21 2050-0135.

22 See www.reginfo.gov for the current approval status of each collection.

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PREP GUIDELINES

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SECTION 1. INTRODUCTION

A. Purpose

The National Preparedness for Response Exercise Program (PREP) was developed to establish a workable exercise program that meets the intent of section 4202(a) of the Oil Pollution Act of 1990 (OPA 90), amending section 311 (j) of the Federal Water Pollution Control Act (FWPCA), by adding subsection (6) and subsection (7) for spill response preparedness [33 U.S.C. 1321 (j)]. The PREP was developed to provide a mechanism for compliance with the exercise requirements, while being economically feasible for the Government and oil industry to adopt and sustain. The PREP is a unified Federal effort and satisfies the exercise requirements of the U.S. Coast Guard (USCG), the Environmental Protection Agency (EPA), the Pipeline and Hazardous Materials Safety Administration (PHMSA), and the Bureau of Safety and Environmental Enforcement (BSEE). Completion of the exercises described in the PREP Guidelines is one option for maintaining compliance with OPA 90-mandated Federal oil pollution response exercise requirements.

PREP addresses the exercise requirements for oil pollution response. Furthermore, the new Salvage and Marine Firefighting (SMFF) exercise requirements described in Section 3 of the guidelines apply only to USCG-regulated vessels in accordance with 33 Code of Federal Regulations (CFR) 155. There are additional industry planning and exercise requirements contained in other Federal statutes that are not addressed in these guidelines.

PREP helps to clarify objectives and evaluation processes for compliance with Federal regulations. There are many processes that plan holders can use to design exercises to meet the objectives. One option is the Homeland Security Exercise and Evaluation Program (HSEEP). This program serves as a recognized and standardized planning process to assist in the design of exercises.

The PREP Guidelines describe the **minimum** expectations for ensuring adequate response preparedness. If Government, industry, or plan holders desire to expand their exercise programs beyond the PREP Guidelines, they are **highly encouraged** to do so.

The PREP exercises should be viewed as an opportunity to inform the continuous improvement process for response plans and the response system. **Plan holders are responsible for addressing any issues that arise from evaluation of exercises and making changes to their respective response plans to ensure the highest level of preparedness.**

B. Applicability and Participation in PREP

Industry plan holders are required to meet pollution response exercise requirements mandated by the Federal primary oversight agency for the specific type of industry involved. Following these PREP Guidelines for developing your exercise program is one option to satisfy regulatory exercise requirements. **Using the PREP Guidelines is**

voluntary. Plan holders are not required to follow the PREP Guidelines and, if they choose not to, may develop their own exercise program that complies with the appropriate Federal oversight agency and regulatory exercise requirements.

The USCG and the EPA are required to follow the PREP Guidelines in the planning and execution of their Area Exercise programs.

All plan holders, whether following the PREP Guidelines or following the exercise mandates of relevant agency regulations, will be subject to Government-initiated unannounced exercises (GIUE). Unannounced exercises are mandated by OPA 90. These exercises are further described in these guidelines.

If an industry plan holder has developed one response plan that covers a fleet of vessels, regional offshore facility (as defined in 33CFR154.105), or offshore facility (as defined in 33 CFR 254.6) operations, this plan holder would only be required to conduct one "set" of exercises for the plan, with the exception of the qualified individual notification exercises, salvage and marine firefighting remote assessment and consultation exercises, and the emergency procedures exercises, which are required for **all** manned vessels and unmanned barges.

C. Effective Date

The PREP Guidelines became effective January 1, 1994. The PREP Guidelines follow the **calendar year**. The exercise year is January 1–December 31.

D. Definitions

Area. That geographic area for which a separate and distinct Area Contingency Plan (ACP) has been prepared, as described in OPA90. For EPA areas with subarea plans or annexes to the ACP, the EPA Regional Administrator shall decide which subarea plan is to be exercised within the triennial cycle. For coastal zone areas that are covered by more than one Coast Guard Captain of the Port (COTP) Zones and have more than one ACP, each COTP Zone shall be considered its own distinct area.

Area Committee. Area Committees are those committees comprised of Federal, State, and local officials, formed in accordance with section 4202 of OPA90, whose task is to prepare an ACP for the area for response to a discharge of oil or hazardous substance.

Area Spill Management Team (SMT). The Area SMT is the group of individuals within the USCG or EPA Federal On-Scene Coordinator (FOSC) organization with responsibility for spill response management within the respective area. The Area SMT should include State and local personnel whenever possible.

Barge Custodian. A barge custodian is the individual that has custody of an unmanned barge. The barge custodian may be affiliated with the towing vessel, fleeting area, or facility at which the barge may be moored. The custodian can be the towing vessel operator, the facility operator, the fleet operator, or whoever may be in charge of the entity that has custody of the barge.

1 **Certification.** Documentation certifies that an exercise (1) was completed; (2) was
2 conducted in accordance with the PREP Guidelines, meeting all objectives listed; and
3 (3) was evaluated using a mechanism that appraised the effectiveness of the response
4 or contingency plan.

5 **Complex Facility.** A complex facility is regulated under section 311 (j) of the FWPCA
6 [33 U.S.C. 1321 (j)] by two or more Federal agencies.

7 **Cooperatives (Co-Op).** A co-op is a classified or nonclassified Oil Spill **Removal** Organization (OSRO)
8 that provides oil spill response coverage. Classified co-ops can provide average most probable discharge
9 (AMPD), maximum most probable discharge (MMPD), and worst case discharge (WCD) coverage while
10 nonclassified co-ops provide only AMPD coverage. It is important to note that classified OSROs can
11 provide AMPD coverage; they just do not receive any classification for it.

12 **Equipment Deployment Exercise.** An equipment deployment exercise is an exercise
13 during which response equipment is deployed to a specific site and operated in its
14 normal operating medium.

15 **Equipment Activation.** Equipment activation is the movement, staging, deployment, or
16 operation of response equipment, as determined by the plan holder in consultation with
17 the exercise design team.

18 **Exercise Design Team.** This team designs the exercise and may be comprised of
19 Federal, State, and industry representatives who are stakeholders in the scenario.

20 **Federal On-Scene Coordinator.** The FOSC is the Federal official predesignated by the
21 EPA or the USCG, prior to an oil spill, to coordinate and direct Federal responses under
22 subpart D of the National Oil and Hazardous Substances Pollution Contingency Plan
23 (NCP), or the official designated by the lead agency to coordinate and direct removal
24 actions under subpart E of the NCP.

25 **Industry.** For the purpose of these guidelines, industry means the vessels, marine
26 transportation-related (MTR) facilities, onshore and certain offshore non-transportation–
27 related facilities, pipelines, and offshore facilities for which response plans for oil spills
28 are required to be submitted by owners or operators. The response plan requirements
29 and regulations for these entities are administered by the USCG, EPA, PHMSA, and
30 BSEE.

31 **Marine Transportation-Related Oil Facility.** This facility type means any onshore
32 facility or segment of a complex regulated under Sec. 311(j) of the FWPCA by two or
33 more Federal agencies, including piping and any structure used, or intended to be used,
34 for transfer of oil to or from a vessel, subject to regulation under Part 154, or any
35 deepwater port subject to regulation under Part 150 of Title 33CFR. For a facility or
36 segment of a complex regulated by two or more Federal agencies under Sec. 311(j) of
37 the FWPCA, the MTR portion of the complex extends from the facility oil transfer
38 system's connection with the vessel to the first valve inside the secondary containment
39 surrounding tanks in the non-transportation–related portion of the facility or, in the
40 absence of secondary containment, to the valve or manifold adjacent to the tanks
41 comprising the non-transportation–related portion of the facility, unless another location
42 has otherwise been agreed to by the COTP and the appropriate Federal official.

1 **Mobile Marine Transportation-Related Facility.** Mobile facility means any facility that
2 can readily change location, such as a tank truck or tank car, other than a vessel or
3 public vessel as defined by 33 CFR 154.105.

4 **National Response System (NRS).** Under 40 CFR part 300 (NCP), the NRS includes
5 the National Response Team (NRT), Regional Response Teams (RRTs), Area
6 Committees, On-Scene Coordinators (OSCs), and State and local government entities
7 involved with response planning and coordination. The PREP, consistent with OPA 90
8 objectives, specifically involves the private sector with the NRS in order to ensure
9 effective exercise development, delivery, and coordination.

10 **Oil Spill Removal Organization (OSRO).** A removal OSRO is an entity that provides
11 response resources. OSROs include, but are not limited to, any for-profit or not-for-profit
12 contractor, cooperative, or in-house response resources established in a geographic
13 area to provide required response resources. Cooperatives and Oil Spill **Response**
14 Organizations (OSROs) are defined separately.

15 **Oil Spill Response Organization (OSRO).** A response OSRO is a co-op (classified or nonclassified) that
16 provides oil spill response coverage. Classified co-ops can provide AMPD, MMPD, and WCD coverage
17 while nonclassified co-ops provide only AMPD coverage. It is important to note that classified OSROs can
18 provide AMPD coverage; they just do not receive any classification for it.

19 **Offshore Facility (33 CFR154.5).** An offshore facility is any facility of any kind located
20 in, on, or under any of the navigable waters of the United States, and any facility of any
21 kind that is subject to the jurisdiction of the United States and is located in, on, or under
22 any other waters, other than a vessel or a public vessel.

23 **Operating Environments.** For the purposes of PREP, there are three types of
24 operating environments (33 CFR 154, 33 CFR 155, 40 CFR 112):

- 25 A. River and canal
- 26 B. Great Lakes/Inland
- 27 C. Ocean (nearshore, offshore, and open ocean)

28 If an OSRO operates in all three environments, the OSRO is required to conduct an
29 exercise of at least the minimum amount of equipment in each of the environments. If
30 the OSRO only operates in two of the environments, it must conduct the exercises in
31 the two environments.

32 **Plan Holder.** The plan holder is the industry (e.g., vessels, MTR facilities, onshore
33 facilities, offshore facilities, and certain offshore non-transportation-related facilities and
34 pipelines) for which a response plan is required by Federal regulation to be submitted
35 by a vessel or facility's owner or operator. If an owner or operator is authorized to
36 prepare one plan for a fleet of vessels or multiple offshore facilities, that owner or
37 operator is considered to be the plan holder.

Planning Volumes for Oil.

- A. Average Most Probable (USCG)/Small (EPA) Discharge.** This definition is agency-dependent, and the appropriate definitions are detailed as follows:
1. For USCG-regulated vessels, a discharge of 50 barrels (2,100 gallons) of oil from the vessel during oil transfer operations (33 CFR 155.1020).
 2. For USCG-regulated facilities, a discharge of the lesser of 50 barrels (2,100 gallons) or 1 percent of the volume of the worst-case discharge (WCD) (33 CFR 154.1020).
 3. For EPA-regulated facilities, a small discharge is a volume of 2,100 gallons (50 barrels) or less, provided this amount is less than the WCD (40 CFR 112.20).
 4. For PHMSA: Not applicable.
 5. For BSEE: Not applicable.
- B. Maximum Most Probable (USCG)/Medium (EPA) Discharge.** This definition is agency-dependent, and the appropriate definitions are detailed as follows:
1. For USCG-regulated vessels, a discharge of 2,500 barrels (105,000 gallons) of oil for vessels with an oil cargo capacity equal to or greater than 25,000 barrels (1,050,000 gallons), or 10 percent of the vessel's oil cargo capacity for vessels with a capacity of less than 25,000 barrels (1,050,000 gallons) (33 CFR 155.1020).
 2. For USCG-regulated facilities, a discharge of the lesser or 1,200 barrels (50,400 gallons) or 10 percent of the volume of a WCD (33 CFR 154.1020).
 3. For EPA-regulated facilities, a discharge greater than 2,100 gallons (50 barrels) and less than or equal to 36,000 gallons (858 barrels) or 10 percent of the capacity of the largest tank at the facility, whichever is less (40 CFR 112.20).
 4. For PHMSA: Not applicable.
 5. For BSEE: Not applicable.
- C. Worst Case Discharge.** This definition is agency-dependent, and the appropriate definitions are detailed as follows:
1. For USCG-regulated vessels, a discharge in adverse weather conditions of a vessel's entire cargo as defined in 33 CFR 155.1020.
 2. For USCG-regulated facilities, the size of the discharge as defined in 33 CFR 154.1020 (in the case of an onshore facility and deepwater port, the largest foreseeable discharge in adverse weather conditions meeting the requirements of 33 CFR 154.1029).
 3. For EPA-regulated facilities, the size of the discharge described in 40 CFR 112.20.
 4. For PHMSA-regulated pipelines, the size of the discharge as defined in applicable regulations (49 CFR 194).
 5. For BSEE-regulated offshore facilities, the size of the discharge as defined in applicable regulations (30 CFR 254).

- 1 **6.** For areas, the size of the discharge as defined in the ACP.
- 2 **7.** For complexes regulated by more than one Federal agency, the largest of
- 3 the WCDs calculated for the various regulated components.

4 **Primary Oversight Agency.** The primary oversight agency is the agency with

5 regulatory authority over a particular industry. For the purposes of the PREP, the four

6 primary oversight agencies and the industries they regulate are the USCG (vessels,

7 MTR facilities), the EPA (onshore and certain offshore facilities landward of the

8 coastline), the PHMSA (pipelines), and BSEE (offshore facilities seaward of the

9 coastline).

10 **Qualified Individual (QI).** A QI is the person located in the United States who meets

11 the requirements identified in the respective Federal regulations (USCG, EPA, PHMSA,

12 BSEE), and who is authorized to do the following: (1) Activate and engage in

13 contracting with oil spill removal organizations; (2) act as a liaison with the OSC; and

14 (3) obligate funds of the plan holder required to effectuate response activities. The QI

15 will be the individual or a designee identified in the response plan.

16 **Remote Assessment and Consultation.** Remote assessment and consultation means

17 contacting the SMFF resource providers identified in a vessel response plan (VRP), by

18 phone or other means of communications to discuss and assess an SMFF situation.

19 The person contacted must be competent to consult on a determination of the

20 appropriate course of action and initiation of a response plan.

21 **Resource Provider.** The resource provider is an entity that provides personnel, equipment, supplies, and

22 other capabilities necessary to perform oil spill removal, SMFF services identified in the response plan,

23 and has been arranged by contract or other approved means.

24 **Salvage Organization.** For the purposes of PREP Section 3, salvage organization

25 refers to companies providing salvage response services, exclusive of marine

26 firefighting services.

27 **Salvage and Marine Firefighting Provider.** SMFF Provider refers to a company

28 providing SMFF response services to vessels.

29 **Self-Certification.** Self-certification is a declaration made by a plan holder that he or

30 she has met the following standards: (1) Completion of the exercise; (2) conducting of

31 the exercise in accordance with the PREP Guidelines, meeting all objectives listed; and

32 (3) evaluation of the exercise using a mechanism that appraises the effectiveness of the

33 response or contingency plan.

34 **Self-Evaluation.** Self-evaluation means that the plan holder is responsible for carefully

35 examining the effectiveness of the plan for response during the exercise. The plan

36 holder may choose the mechanism for conducting this appraisal, as long as it

37 appropriately measures the plan's effectiveness. The plan holder is responsible for

38 addressing issues that arise in the exercise that would lead to improvements in the

39 response plan or any aspect of preparedness for spill response. The plan holder is

40 responsible for incorporating necessary changes to the response plan as a result of the

41 exercise.

1 **Spill Management Team.** The SMT is the group of personnel identified to staff the
2 appropriate organizational structure to manage spill response implementation in
3 accordance with the response plan.

4 **Spill Response Operating Team (30 CFR 254.6).** The trained persons who respond to
5 spills through deployment and operation of oil spill response equipment.

6 **Tabletop Exercise (TTX).** For the purpose of the PREP, a TTX is an exercise of the
7 response plan and the SMT's response efforts without the actual deployment of
8 response equipment.

9 **Timely.** As used in relation to USCG and EPA Government-initiated unannounced
10 exercise (GIUE) programs, this means the times established in the appropriate
11 response planning regulations issued by the EPA and USCG for providing response
12 resources to a small or average most probable spill or significant threat of such a spill.

13 **Unified Command.** This entity is a command structure consisting of the OSC,
14 representatives from the State, the responsible party, and other parties as appropriate.
15 The Unified Command is utilized during a spill response to achieve the coordination
16 necessary to carry out an effective and efficient response.

17 **Verification.** Verification is the act of ensuring that an exercise was properly
18 documented and certified. Verification would be conducted by the USCG, EPA,
19 PHMSA, or BSEE. Verification of the exercise records may be conducted through
20 normal operations of the regulatory agency, such as inspections, boarding, spot checks,
21 or other systems developed to ensure that exercises are being conducted and properly
22 documented.

23 **Vessel.** For the purpose of the oil spills, a vessel is any vessel required by 33 CFR 155
24 to submit a response plan. A "vessel" includes unmanned barges.

SECTION 2. GUIDING PRINCIPLES

A. Internal and External Exercises

1. Internal Exercises

Internal exercises are planned and implemented within the plan holder's organization. This type of exercise may include personnel that are employed or contracted by the plan holder such as the QI and those affiliated with the plan holder's SMT. Plan holders should consider the appropriate level of involvement of external participants. The internal exercises are designed to examine specific components of the response plan, and cumulatively to ensure that the whole plan is ready to be implemented.

Internal exercises include:

- A. QI notification exercises
- B. Remote assessment and consultation exercises (SMFF) for vessels and barges
- C. Emergency procedures exercises for vessels and barges
- D. Emergency procedures exercises for facilities (optional)
- E. SMT TTX exercises
- F. Shore-based salvage and shore-based marine firefighting management team TTXs for vessels and barges
- G. Equipment deployment exercises

All internal exercises should be self-evaluated and self-certified by the owner or operator.

2. External Exercises

External exercises are exercises that extend beyond the internal focus of the plan holder's organization, and involve other members of the response community, including State, local, and/or tribal officials (where appropriate). External exercises are intended to evaluate a plan holder's ability to coordinate with the oil spill community and conduct an effective response to a pollution incident.

External exercises include:

- A. Area exercises
- B. GIUE

While GIUEs will not usually involve all members of the response community, the involvement of an agency outside of the plan holder's organization places it in the category of an external exercise.

B. Qualified Individual (QI) Notification Exercises

The purpose of the QI notification exercise is to ensure that the QI (or designee) listed in the response plan will respond as expected and carry out his or her required duties in a spill response emergency. Contact by telephone or electronic messaging must be made with the QI, and confirmation must be received from him or her to satisfy the requirements of this exercise.

The QI notification exercise is not intended to verify phone numbers, points of contact, or the notification list contained in the plan. The plan holder is expected to verify this information when updating the notification list periodically (recommended at least once every 6 months) as part of the normal course of conducting business.

At least once per year, the QI notification exercise should be conducted during **nonbusiness hours**.

1. Vessels

For vessels, it is the responsibility of the plan holder to ensure that the QI notification exercise is conducted. If a plan holder has a fleet of vessels covered by one response plan, the plan holder must ensure that **each** vessel in the fleet conducts this exercise.

For vessels, electronic messaging will be acceptable, but the baseline should be voice communication. If electronic messaging is used for this exercise, confirmation from the QI must be received to properly satisfy the requirements of this exercise.

2. Unmanned Barges

For unmanned barges, it is the responsibility of the plan holder to ensure that the QI notification exercise is conducted. **If a plan holder has a fleet of unmanned barges covered by one response plan, during each quarter the plan holder should randomly choose a barge in the fleet to conduct the QI notification exercise.** The plan holder should have the barge custodian of the chosen barge conduct the exercise. This method will ensure that all barges and custodians are ultimately included in the exercises.

C. Remote Assessment and Consultation Exercise for Vessels

The purpose of the remote assessment and consultation exercise for vessels with SMFF requirements is to ensure that the vessel master and the shore-based management team will communicate with SMFF resources providers as expected when a situation presents a discharge or substantial threat of a discharge. Substantial threats of a discharge may exist during, but are not limited to, grounding, stranding, collision, hull damage, fire, explosion, loss of propulsion, flooding, and equipment failure, where taking preventive action may prevent spillage.

The response plan for vessels with SMFF requirements should be followed to initiate remote assessment and consultation with the contracted SMFF provider. The person contacted in the SMFF provider's organization must be competent to consult on a determination of the appropriate course of action and initiation of a response plan. The

assessment is intended to allow sound decisions to be made for subsequent salvage efforts. A suggested initial course of action should be determined with the SMFF provider to satisfy the requirements of this exercise.

The remote assessment and consultation exercise must be conducted quarterly when the vessel is operating in U.S. waters, including the exclusive economic zone (EEZ); otherwise upon entry into U.S. waters, not to exceed four times per year. The remote assessment and consultation exercise would not be required for vessels outside of U.S. waters. This exercise should be conducted during nonbusiness hours at least once per year.

1. Vessels

For vessels, it is the responsibility of the plan holder to ensure that the remote assessment and consultation exercise is conducted. If a plan holder has a fleet of vessels covered by one response plan, the plan holder must ensure that **each** vessel in the fleet conducts this exercise. Since remote assessment and consultation procedures involve a change in the way a vessel master responds to an emergency presenting a significant threat of a spill, it is important that each **vessel** conduct this exercise quarterly, when operating in U.S. waters.

2. Unmanned Barges

For unmanned barges, it is the responsibility of the plan holder to ensure that the remote assessment and consultation exercise is conducted. **If a plan holder has a fleet of unmanned barges covered by one response plan, during each quarter the plan holder should randomly choose a barge in the fleet to conduct the remote assessment and consultation exercise.** The plan holder should have the barge custodian of the chosen barge conduct the exercise. This method will ensure that all barges and custodians are ultimately included in the exercises.

D. Emergency Procedures Exercises

The purpose of the emergency procedures exercises is to ensure that personnel are capable of conducting the initial actions necessary to mitigate the effects of a spill.

1. Vessels

For vessels, it is the responsibility of the plan holder to ensure that the emergency procedures exercise is conducted. If a plan holder has a fleet of vessels covered by one response plan, the plan holder must ensure that **each** vessel in the fleet conducts this exercise. Since vessels do not always sail with the same crews, it is important that **each** vessel conducts this exercise quarterly to ensure that the personnel on board are familiar with the procedures for mitigating a spill or potential spill, as well as an SMFF incident, occurring from that vessel.

2. Unmanned Barges

For unmanned barges, it is the responsibility of the plan holder to ensure the emergency procedures exercise is conducted.

1 **If a plan holder has a fleet of unmanned barges covered by one response plan,**
2 **during each quarter the plan holder should randomly choose a barge in the fleet**
3 **to conduct the emergency procedures exercise.** The plan holder should have the
4 barge custodian of the chosen barge conduct the exercise. The plan holder should
5 choose the barges and the various custodians randomly to ensure that all barges and
6 custodians will ultimately be included in the exercises.

7 **3. USCG and EPA Marine Transportation-Related (MTR) Facilities (optional)**

8 Facilities have the option of conducting emergency procedures exercises. For the
9 purpose of the PREP, emergency procedures for facilities are the procedures
10 established at the facility to mitigate or prevent any discharge or a substantial threat of
11 such discharge of oil resulting from facility operational activities associated with cargo
12 transfers. **An emergency procedures exercise conducted unannounced would**
13 **satisfy the facility's requirement for the annual unannounced exercise.**

14 **E. Spill Management Team Tabletop Exercises (TTX)**

15 For USCG, EPA, and BSEE-regulated plan holders, the owner or operator should
16 identify an SMT in the response plan. The SMT should conduct an annual TTX, in
17 accordance with the PREP Guidelines. The response plan should be utilized in the
18 exercise to ensure that the SMT is familiar with the plan and is able to use it effectively
19 to conduct a response, including response options described in the plan. At least one
20 SMT TTX in a triennial cycle should involve a WCD scenario. The exercise design team
21 may use alternative WCD scenarios that are representative of worst case scenario
22 (e.g., exercise of line segment WCD) for environmental impact purposes.

23 If a response plan lists different types of SMTs for varying sizes of spills (for example, a
24 local SMT for small spills, a regional team for larger spills, and a national team for major
25 spills), each team identified should be required to conduct an annual SMT TTX.

26 **F. Shore-Based Salvage and Shore-Based Marine Firefighting** 27 **Management Team Tabletop Exercises (TTX) for Vessels**

28 The VRP holder who must follow 33 CFR 155, Subpart I, SMFF, shall conduct shore-
29 based salvage and shore-based marine firefighting management team TTXs annually.
30 This requirement for an annual exercise will be satisfied if conducted in accordance with
31 the PREP Guidelines. The response plan, and associated pre-fire plan when applicable,
32 must be utilized in the exercise to ensure the management teams are familiar with the
33 plans and able to use them effectively to conduct an SMFF response.

34 The plan holder is required to conduct one annual shore-based salvage and one annual
35 shore-based marine firefighting management team exercise of the primary provider
36 cited for the fleet of vessels in a response plan. These annual exercises may be
37 conducted in conjunction with the annual SMT TTX, or separately.

G. Equipment Deployment Exercises

The purpose of equipment deployment exercises is to ensure response equipment is appropriate for the operating environment in which it is intended to be used and that operating personnel are trained in its deployment and operation. The equipment deployment exercise guidelines apply to all plan holders. It is the **responsibility of the plan holder** to ensure that his or her respective equipment deployment exercise requirements are met.

A plan holder's equipment deployment exercise program should include the following components:

- A. Personnel who would normally operate or supervise the operation of the response equipment must participate in the exercise.
- B. Personnel must demonstrate the ability to deploy and operate the equipment, while wearing appropriate personal protective equipment.
- C. A training program must be provided for all personnel involved in equipment deployment and for equipment operators. All operating personnel must participate in exercises or responses on an annual basis in order to ensure that they remain trained and qualified to operate equipment in the operating environment.
- D. Response equipment must be in good operating condition.
- E. Equipment must be appropriate for the intended operating environment.
- F. Equipment must be operated during the exercise.
- G. There must be a maintenance program for all response equipment.

Plan holders are responsible for ensuring that all equipment types cited in their respective plan are exercised, whether the equipment is plan holder owned and operated, or supplied through an OSRO/SMFF provider. It is not necessary to deploy every piece of each type of equipment as long as all equipment is included in a periodic inspection and maintenance program intended to ensure that the equipment remains in good working order.

Although not required as part of this section, plan holders are encouraged to use these exercises as an opportunity to validate response strategies detailed in ACPs for the protection of environmentally sensitive and economically significant areas.

1. Classified OSRO Involvement in Equipment Deployment Exercises

The PREP Guidelines identify the minimum amount of equipment that should be deployed in an equipment deployment exercise. This amount is considered to be a representative sample of the equipment. The rationale for this approach is that if the representative sample works, then the rest of the equipment could be expected to work since it would be part of the company's maintenance program. For the personnel, if a representative sample of the OSRO's personnel are involved in the deployment exercise and handle their responsibilities effectively, the rest of the personnel could be expected to be knowledgeable and effective since they would be a part of the company's training program. **When selecting the equipment and personnel for the exercise, the OSRO should ensure that the same equipment and personnel are**

1 **not used repeatedly for each exercise. The equipment should be selected on a**
2 **rotational basis, as with the personnel, with the ultimate goal of eventually**
3 **exercising all of the OSRO's equipment and personnel.**

4 If an OSRO has separate field response facilities located throughout the country in
5 areas that do not lend themselves to regional consolidation, each staffed field response
6 facility, for the purpose of the PREP, will be considered a separate OSRO and will be
7 required to conduct an annual equipment deployment exercise of the minimum amount
8 of equipment specified in the PREP.

9 In both cases, if the OSRO is classified to deploy equipment to more than one type of
10 operating environment, the OSRO must conduct a deployment exercise in each of the
11 environments.

12 A few of the larger OSROs have small field response facilities. A field response facility
13 is defined as a location where personnel and equipment are staged. Some of these
14 OSROs have divided their operations into regional response facilities. In some
15 instances, a regional facility will be responsible for several small field response facilities
16 or equipment stockpiles. For the purpose of the equipment deployment exercises under
17 the PREP, **each regional facility** will be considered a separate OSRO and will be
18 required to conduct an annual equipment deployment exercise of the minimum amount
19 of equipment specified in the PREP. The OSRO regional facility would be responsible
20 for coordinating resources from all field facilities within the region for the exercise. In
21 such instances, equipment may be drawn from one or more field facilities, but
22 **personnel** from **each** field facility must participate in the equipment deployment
23 exercise. If the OSRO operates using regional facilities, the OSRO will be responsible
24 for defining its regional boundaries and providing information to its plan holders.
25 Generally, however, regions should be reasonable in geographic size. At a minimum,
26 plan holders must ensure that their OSRO(s) conduct annual equipment deployment
27 exercises in each operating environment in which they expect to operate for each
28 USCG district or RRT regions and EPA ACP area, or EPA subarea (where identified),
29 unless adjoining areas or subareas authorize an alternative. For example, if an OSRO is
30 located in the First USCG District, and provides response assets to the Fifth USCG
31 District as well, those two might mutually agree to allow the OSRO to conduct fewer
32 exercises due to similarity of operating environments in those areas and opportunity to
33 observe the exercises. The OSRO should request this consideration in writing to the
34 appropriate Area Committees and/or EPA subarea.

35 If the OSRO is cited in a response plan outside of its normal equipment staging and
36 operating areas (e.g., as a Tier 2 responder), the plan holder citing that OSRO must
37 ensure that the OSRO has the local knowledge relevant to an effective, efficient
38 response in the plan holder's operating area. The plan holder must describe
39 arrangements for providing the OSRO with information such as equipment launching
40 locations, tides and currents of the local area, and any other logistical problems or
41 information specific to the particular area.

42 Plan holders are encouraged to conduct a familiarization exercise with each OSRO
43 cited in the response plan to provide information such as equipment launching
44 locations, tides and currents of the local area, and any other logistical problems or

information specific to the particular area. This familiarization exercise may include a walk-through or actual equipment deployment as appropriate, such that each OSRO can be made aware of any logistical problems related to equipment deployment.

It is the plan holder's responsibility to ensure that the OSRO has completed the equipment deployment exercise requirements and has obtained the necessary documentation. All plan holders must remember that merely citing an OSRO in their response plan is not sufficient to ensure credit for the equipment deployment exercise.

2. Cooperatives (Co-Ops)

For co-ops that are comprised of several OSROs, which may or may not be classified, **each separate OSRO** that makes up the co-op would be required to conduct an **annual** equipment deployment exercise of the **minimum amount of equipment** listed below.

For the purposes of the PREP Guidelines, co-ops must meet the same annual exercise requirements as all other OSROs. Each facility and the personnel will not have to conduct the exercise individually. The co-op as a whole would conduct **one** equipment deployment exercise per year. **Representatives from all of the facilities comprising this co-op must participate in this exercise.**

Co-op personnel that are responsible for deploying the response equipment must be involved in a training program, which prepares them for operating the response equipment. Likewise, the co-op must have a maintenance program for all of the response equipment.

3. Vessel and Facility Plan Holder Owned and Operated Equipment

Plan holder owned and operated equipment is defined as equipment owned by a plan holder and operated either by the plan holder's own personnel or other personnel hired by the plan holder to operate this equipment. Whoever operates this equipment must be involved in the equipment deployment exercises.

If plan holder owned and operated equipment is identified for use in a spill response plan, the plan holder is required to deploy this equipment twice per year (semiannually). The plan holder would be required to deploy the minimum amount of equipment for deployment specified in this section or the total amount of equipment that the plan holder has available for response, **whichever is less**. The requirement for **semiannual** equipment deployment is based on the fact that this equipment is not deployed routinely and that the personnel operating it do not do this as a part of the vessel's or facility's normal operations. The semiannual requirement is necessary to ensure adequate preparedness for spill response.

The plan holder's personnel responsible for deploying the response equipment must be involved in a training program that prepares them for operating the response equipment. Likewise, the vessel/facility plan holder must have a maintenance program for all of the response equipment.

1 **4. Plan Holders Using a Combination of OSRO Equipment and Plan Holder**
2 **Owned and Operated Equipment**

3 Plan holders citing **both** OSRO equipment and their own equipment in their response
4 plans would be required to exercise both types of equipment at the above described
5 intervals.

6 **5. Types of Oil System Equipment To Be Deployed in Internal Equipment**
7 **Deployment Exercises**

8 **a. Oil Response Systems**

9 **A. Mechanical Skimming/Recovery Systems.** One of each type of skimming
10 system as listed in the plan. A skimming system includes containment boom,
11 hoses, piping, pumps, prime movers, support vessels, etc., necessary for the
12 effective operation of that system.

13 Types of skimming/recovery systems may include, but are not limited to:

- 14 1. Oleophilic – Brush
- 15 2. Oleophilic – Disc
- 16 3. Oleophilic – Paddle belt
- 17 4. Oleophilic – Rope mop
- 18 5. Oleophilic – Sorbent lifting belt
- 19 6. Oleophilic – Submersion belt
- 20 7. Oleophilic – Submersion plane
- 21 8. Suction (including vacuum trucks)
- 22 9. Weir
- 23 10. Advancing weir
- 24 11. Special-purpose skimmers; e.g., fast water

25 **B. In Situ Burn (ISB) Systems.** Each ISB package listed in the plan and relied on
26 by the plan holder in meeting response equipment capability requirements,
27 including boom, method of ignition, support vessels, and smoke plume
28 monitoring equipment. Deployment or use of ISB should not occur during the
29 exercise unless directed by the FOSC.

30 **C. Dispersant Systems.** Each dispersant package listed in the plan and relied on
31 by the plan holder in meeting response equipment capability requirements,
32 including dispersant delivery vehicles, application equipment, and dispersed oil
33 plume monitoring equipment. Deployment or use of the actual dispersant
34 should not occur during the exercise unless directed by the FOSC.

35 **D. Booming Systems.** Includes protective and containment boom not exercised
36 as part of a skimming or ISB system described above; 1,000 feet (or total
37 amount of boom listed in plan, whichever is less) of each protective or
38 containment boom system listed in the plan and relied on by the plan holder in
39 meeting response equipment capability requirements. Protective boom
40 systems (boom and means of deploying and anchoring) include the following
41 types:

- 42 1. Fence boom

2. Curtain boom: Internal foam, external foam, self-inflatable, and pressure inflatable
3. External tension boom
4. Tidal seal boom
5. Special purpose
6. Ice booms
7. Fast-water booms (equipment and/or techniques intended to improve spill containment, control in fast-water situations)

b. Area Equipment Deployment

The area equipment deployment exercise involves USCG and EPA "first aid" response equipment trailers and the USCG's prepositioned Vessel of Opportunity Skimming Systems (VOSS) and shipboard Spilled Oil Recovery Systems (SORS) equipment. All of the "first aid" equipment or that which is necessary to respond to an average most probable discharge in the area, **whichever is less**, would be deployed annually.

c. Salvage and Marine Firefighting (SMFF) Equipment Deployment Exercises

The vessel owner or operator of vessels having SMFF requirements should ensure that the SMFF provider identified in the response plan exercises a representative sample of the SMFF equipment described in 33 CFR 155.4025 and 155.4030 for the following categories of SMFF services:

- A. Salvage assessment and survey
- B. Stabilization
- C. Specialized salvage operations
- D. Marine firefighting assessment and planning
- E. Marine fire suppression

The SMFF provider must be identified by contract or other approved means, with a funding agreement, and the equipment deployment exercises documented according to PREP Guidelines.

The SMFF provider should ensure that the same equipment and personnel are not used repeatedly for each exercise. The ultimate goal is to exercise each type of equipment and personnel. SMFF equipment should be deployed in each applicable operating area within a 3-year exercise cycle.

It is the vessel plan holder's responsibility to ensure that the contracted SMFF provider has completed PREP equipment deployment exercise requirements. All vessel plan holders identifying a contracted SMFF provider in their response plans should document completion of their equipment deployment requirements following receipt of exercise information from the SMFF provider.

H. Unannounced Exercises

Unannounced exercises are one of the cornerstones of oil spill exercise requirements for industry. They provide plan holders and regulatory agencies with the opportunity to

1 evaluate VRP and facility response plan (FRP) procedures for notifications, OSRO
2 response time to the incident location, and deployment of MTR facility-owned or OSRO
3 equipment in response to an AMPD.

4 To maintain an adequate level of oil spill preparedness in the local area, it is highly
5 important to continually evaluate the readiness of OSROs to deploy their equipment
6 during a realistic scenario and fulfill obligations to their plan holders.

7 **1. Internal**

8 Annually, each plan holder should ensure that one of the following is conducted as an
9 **unannounced** exercise:

- 10 **A.** Emergency spill procedures exercise for vessels and barges
- 11 **B.** Emergency procedures exercise for facilities (optional)
- 12 **C.** SMT TTX
- 13 **D.** OSRO equipment deployment exercise

14 Additionally, each vessel plan holder with SMFF requirements should ensure that one of
15 the following is conducted as an **unannounced** exercise:

- 16 **A.** Emergency SMFF procedures exercise for vessels and barges
- 17 **B.** SMFF equipment deployment exercise for vessels and barges

18 An unannounced exercise is one in which the exercise participants do not have prior
19 knowledge of the exercise, as would be the situation in an actual spill and/or SMFF
20 incident.

21 To satisfy OPA 90 requirements for unannounced drills and maintain an adequate
22 posture for response preparedness, it is necessary to have an exercise program
23 comprised of both announced and unannounced exercises. The annual unannounced
24 exercise requirement is necessary to maintain the level of preparedness to effectively
25 respond to a spill.

26 A response to an actual spill may be considered for unannounced exercise requirement
27 credit, if the response was evaluated.

28 The emergency procedures exercise is being offered as an option for facilities, to
29 provide an additional exercise that may be conducted unannounced.

30 **2. Government-Initiated Unannounced Exercises (GIUEs)**

31 GIUEs are compliance activities that allow regulatory agencies the opportunity to
32 evaluate plan holder emergency procedures and OSRO capabilities for response time
33 and equipment deployment.

34 The GIUEs are designed to give the agency with primary regulatory oversight over a
35 particular industry the opportunity to evaluate the realistic level of oil spill preparedness.
36 The frequency of these drills for the noted agencies is as follows:

- 1 **A.** For USCG-regulated vessels and facilities, GIUEs are limited to a maximum of
2 four per COTP zone per year.
- 3 **B.** For EPA-regulated facilities, GIUEs are limited to a minimum of 10 percent of
4 the plan holders per EPA region per year.
- 5 **C.** For PHMSA-regulated pipelines, the agency reserves the authority to conduct
6 and require an operator to participate in a PHMSA-initiated unannounced
7 exercise.
- 8 **D.** For BSEE-regulated offshore facilities, the number of GIUEs is determined by
9 the OSRD Division Chief and may exceed 50 per year nationally. A facility will
10 not participate in a BSEE unannounced exercise more than once per year,
11 unless the results of previous exercises indicate that follow-up drills are
12 warranted due to inadequate performance during a drill.

13 A plan holder directed to participate in a GIUE is **required to do so unless specific**
14 **conditions exist that may result in safety hazards.** The cost of the unannounced
15 exercise will be borne by the response plan holder.

16 Federal agencies are encouraged to engage regulatory partners in conducting local joint
17 GIUEs to leverage scarce resources in order to more readily assess plan holder and
18 OSRO capability within the local area. Joint USCG and EPA GIUEs should include an
19 AMPD scenario for either the USCG-regulated or EPA-regulated portion of the facility.
20 USCG units also have the opportunity to participate in BSEE-led GIUEs in BSEE's Gulf,
21 Pacific, and Alaska regions.

22 For complex facilities that are regulated by two or more agencies, it is the responsibility
23 of the exercising agency to notify and invite the participation of the other agency and the
24 responsible OSC in advance, so as to minimize the possibility of the facility being
25 exercised multiple times during a compressed time period.

26 **3. Successful Completion of Government-Initiated Unannounced Exercises** 27 **(GIUEs)**

28 A plan holder that has successfully completed a GIUE will not be required to participate
29 in another Federal GIUE for at least 36 months from the time of the last exercise
30 provided that the drill protocols and method of evaluation are equivalent. The plan
31 holder must maintain documentation of this participation. If a vessel participates in a
32 GIUE and meets all evaluation criteria, all vessels that fall under that particular VRP are
33 not required to participate in another GIUE in the same COTP zone for at least
34 36 months.

35 Guidelines for determining successful completion of an exercise and for determining
36 enforcement actions (including, but not limited to, assessment of civil penalties) for an
37 unsuccessful exercise are the responsibility of the individual oversight agencies, based
38 on application of their individual agency regulations.

39 Each industry GIUE participant may follow the appropriate steps to document the
40 exercise and take credit, as prescribed in these guidelines, for successful completion of
41 the exercised portion of their respective response plans.

For an exercise to be successful, it must meet the scope and objectives established for each particular GIUE. Proper notifications and equipment deployment in response to AMPD spill scenarios (vessel and facility) are the two primary objectives evaluated by the initiating authority. Failure to successfully complete an exercise indicates one or more of the following:

- A. The plan holder could not properly implement its response plan.
- B. Response resources were not available or not in operating condition.
- C. Response personnel were not adequately trained in implementing the response plan.

Enforcement actions that may be necessary include, but are not limited to, successful completion of an additional unannounced exercise, revisions to the approved response plan, or administrative action by the initiating authority. It is the responsibility of the agency with oversight of the regulated entity to develop specific guidelines for determining the successful completion of an exercise and for determining appropriate enforcement actions for an unsuccessful exercise.

One of the objectives for successful completion of an exercise is to demonstrate that the response can be conducted in a timely manner. Note that the term “timely” is associated with a planning rather than a performance standard. Timely is **defined** in Section 1 of these guidelines and is further discussed in specific portions of the Guiding Principles and in those sections of the guidelines that address specific exercise elements for vessels and facilities.

4. Marine Transportation-Related Facilities and Vessels Regulated by the USCG

a. Criteria for OSRO Evaluation

USCG-initiated unannounced exercises will be guided by the following concepts when determining the success of an exercise. Keeping in mind that response timeframes in the regulations are planning standards and not performance standards, and that the GIUE program focuses on AMPD, successful completion **cannot** be determined by a stopwatch, but by subjective evaluation of a variety of factors including:

- A. Response resources located within 17-mile radius of transfer site (boom: 1-hour response time over the road, given half hour for mobilization) and 52-mile radius of transfer site (recovery equipment: 2-hour response time over the road, given half hour for mobilization) if response personnel are standing by with the equipment during any plan holder transfer operation.
- B. For lightering, bunkering, etc., on water, response resources located within 2.5 nautical miles radius of transfer site (boom: 1-hour response time over the road, given half hour for mobilization) and 7.5 nautical miles radius of transfer site (recovery equipment: 2-hour response time over the road, given half hour for mobilization) if response personnel are standing by with the equipment during any plan holder transfer operation.
- C. Personnel to operate the equipment need not be colocated with the equipment, as long as those personnel are located within the same response radius and

1 personnel needed to mobilize and transport the equipment are colocated with
2 the equipment.

3 **D.** If plan holder notifies and orders OSRO equipment quickly and the OSRO
4 demonstrates its capability to mobilize the equipment immediately, then the
5 precise time the equipment arrives on scene is not important. USCG exercise
6 personnel may opt to send a team to the OSRO site to observe mobilization as
7 part of the exercise; e.g., boom is 7 miles away from transfer site. At 35 miles
8 per hour, that boom can be on scene in 12 minutes, so if notification and
9 mobilization can be completed in 45 minutes, it is reasonable to assume that
10 the boom will be on scene in less than 1 hour. If boom is 17 miles away,
11 notification and mobilization must be completed in 30 minutes. If it is 28 miles
12 away, mobilization must be complete in 15 minutes, and so on.

13 **E.** Under the above circumstances, it does not matter how soon the equipment
14 and personnel arrive on scene because any delay can reasonably be
15 presumed to have been caused by the incident rather than the average
16 conditions on which the planning travel times are based.

17 **F.** Once the equipment is delivered on scene, personnel should be able to deploy
18 and operate the equipment without significant difficulty; e.g., people should
19 generally be aware of locations of equipment launch sites, anchoring points,
20 and deployment strategies. However, because specific conditions vary at every
21 site, deployments are not likely to be entirely seamless and personnel may
22 need to make adjustments that will delay completion of the deployment. In fact,
23 the ability to adjust to these differing environmental conditions may be an
24 indicator of the competence of response personnel.

25 **G.** While it is intended that equipment be in the water and operational before the
26 end of a 4-hour exercise period, there are circumstances, particularly related to
27 safety and noninterference with actual operations, that may delay completion
28 of deployment beyond that time. In such a case, exercises should continue
29 until equipment is deployed and operated satisfactorily.

30 **5. Certain Vessels Regulated by the USCG**

31 ***a. Criteria for Evaluation of Salvage and Marine Firefighting (SMFF) Service*** 32 ***Providers***

33 USCG-initiated unannounced exercises will be guided by the following concepts when
34 determining success of an SMFF exercise. Keeping in mind that response timeframes in
35 the regulations are planning standards and not performance standards, successful
36 completion cannot be determined by a stopwatch, but by subjective evaluation of a
37 variety of factors including:

38 **A.** The execution of proper notifications.

39 **B.** The ability to mobilize and transport personnel and equipment such that
40 resources could arrive in the timeframe required by regulation. USCG exercise
41 personnel may choose to send a team to the SMFF resources or launch site(s)
42 to observe mobilization as part of the exercise.

- C. The ability of personnel to deploy and operate the equipment without significant difficulty. Personnel should generally be aware of locations of equipment launch sites and deployment strategies.
- D. The ability for personnel to adjust to differing environmental conditions may be an indicator of the competence of response personnel; e.g., deployments are not likely to be entirely seamless and personnel may need to make adjustments that will delay completion of the deployment.

SMFF resources with response timeframes of 4 hours or less (e.g., onsite fire assessment, external firefighting teams, and external vessel firefighting systems) should be on scene and operational at or before the end of the 4-hour exercise period. There are circumstances that may delay completion of the deployment beyond 4 hours. In such a case, the exercise should continue until the resource is deployed and operational.

For SMFF resources with timeframes longer than 4 hours, an evaluation may be based on the first 4 hours of mobilization, or USCG exercise personnel may choose to observe the operation at a local SMFF provider site.

6. Non-Transportation–Related Facilities Regulated by the EPA

The measure of an effective GIUE will be the overall ability of the responders identified in the FRP to rapidly and effectively control a small discharge, with particular attention to those actions that afford the best chances to control a spill and minimize its impact in the first few hours of the incident. While recognizing that an effective response to an oil discharge entails the rapid deployment of proper equipment, it is not the intention of the EPA to use timeliness as the sole factor when evaluating the response to a GIUE for a small discharge. EPA personnel will evaluate whether the response equipment in the FRP arrives on time. These times are listed in the FRP and are based on the response planning requirements in 40 CFR 112 or alternative response times when approved by the Regional Administrator. Whether the containment boom and recovery devices specified in the FRP arrive precisely at the specified times is less relevant than the overall conduct of the exercise and the successful achievement of the exercise objective described in PREP. The objective of a GIUE for a small discharge includes the following subobjectives:

- A. Conducting proper notifications
- B. Arrival of containment boom as specified in the approved FRP within 1 hour of detection of the discharge and the subsequent successful deployment
- C. Arrival of oil recovery devices as specified in the approved FRP within 2 hours of detection of the discharge and the subsequent successful operation/simulated recovery
- D. Demonstrating the availability of adequate storage capacity for recovered oil
- E. Properly conducting the exercise considering the size of a small discharge, including the skill and competency of responders and material readiness of response equipment

The failure to achieve any one subobjective should not automatically indicate that an exercise is a failure. EPA personnel evaluating the exercise should assess:

- A. The plan holder's ability to conduct proper notifications
- B. Material readiness of response equipment
- C. The overall ability of responding personnel to mobilize, arrive on scene in a timely manner, properly deploy the containment boom, simulate recovery of oil, and demonstrate skill and competency during the 4-hour exercise window

The EPA exercise evaluator will have a subjective role in determining the success of the exercise based on the achievement of the exercise objectives within the specified time. These evaluations will be dependent on spill site and circumstances. EPA personnel may request to review records of previous FRP exercises when there is a concern that the response time is excessive. As the result of an unsuccessful exercise, the EPA may require the plan holder to participate in additional GIUEs, revise the existing FRP, or both. Unsuccessful GIUEs may also result in enforcement action against the plan holder.

a. Safety During Exercises and Responses

Safety during an exercise or an actual response is everyone's responsibility; however, the plan holder and responders carry the primary responsibility for employee safety. The response plan should comply with all regulatory requirements while considering safety factors. Plan holders and responders are never expected to operate in an unsafe or illegal manner during an exercise or actual response. It is the plan holder's responsibility to confirm that the resources identified in the response plan can mount an effective response while operating within all applicable laws and regulations. In short, there is no expectation or justification for placing people at risk during an exercise or response. Safety violations will be considered a failure to follow response plans and likely lead to an unsatisfactory exercise.

I. Response Plan Triennial Exercise Cycle

Every 3 years, all components of the entire response plan must be exercised. Rather than requiring each plan holder to conduct a major exercise every 3 years, the PREP is designed for the individual components to be exercised in portions through required exercises.

1. Plan Components

The following are basic types of plan components that must be exercised at least once every 3 years:

Organizational Design

- A. Notifications
- B. Staff mobilization and/or
- C. Ability to operate within the response management system described in the plan

Operational Response

- A. Discharge prevention/control

- B. Assessment of discharge, potential discharge, or fire
- C. Containment of discharge/vessel stabilization/fire suppression
- D. Recovery of spilled material
- E. Protection of sensitive areas and/or
- F. Disposal of recovered material and contaminated debris

Response Support

- A. Communications
- B. Transportation
- C. Personnel support
- D. Equipment maintenance and support
- E. Procurement and/or
- F. Documentation

While not all of these components would necessarily be contained in each plan, the plan holder should identify those that are applicable from the list above, and add or delete other components as appropriate. The plan holder would then be responsible for ensuring that all components of the plan are exercised within each 3-year exercise cycle.

To satisfy the requirement of the triennial exercise of the entire response plan, it is not necessary to exercise the entire plan all at one time. The plan may be exercised in segments over a period of 3 years, as long as each component of the plan is exercised at least once within the 3-year period. The required exercises should be conducted to ensure that each component is addressed and exercised within the triennial cycle. Appendix A includes a template for use by plan holders.

The plan holder is responsible for documenting the components completed in each exercise.

2. Internal Exercise Cycle

In the triennial cycle, the following internal exercises must be conducted:

- A. Twelve QI notification exercises
- B. Twelve remote assessment and consultation exercises: Manned vessels having SMFF requirements and unmanned barge plan holders with barges having SMFF requirements
- C. Twelve emergency procedures exercises: Manned vessels and unmanned barges (optional for facilities); for vessels having SMFF requirements, six of these emergency procedures exercises should address SMFF scenarios
- D. Three SMT TTXs: One must involve a WCD scenario
- E. Three shore-based salvage and three shore-based marine firefighting management team TTXs: **Plan holders with vessels having SMFF requirements**

- F.** Three unannounced exercises: Any of these exercises—emergency spill procedures, SMT TTXs, OSRO equipment deployment exercises, if conducted unannounced
- G.** Six additional unannounced exercises for plan holders with vessels having SMFF requirements: Three emergency SMFF procedures exercises and three SMFF equipment deployment exercises, if conducted unannounced

3. Equipment Deployment Exercises

- A.** For vessel/facility owned and operated equipment: Six plan holder owned and operated equipment deployment exercises (for plan holders with vessel/facility owned and operated equipment identified in their response plan)
- B.** For vessels and facilities with OSROs identified for response equipment: Three OSRO equipment deployment exercises
- C.** For plan holders of vessels having SMFF requirements: Three SMFF equipment deployment exercises
- D.** For pipelines, three pipeline equipment deployment exercises, using either OSRO and/or operator owned equipment
- E.** For offshore facilities: Three equipment deployment exercises for equipment staged onshore
 - 1.** Six equipment deployment exercises for equipment staged offshore

J. Area Exercises

The purpose of the area exercise is to exercise the entire response community in a particular area. An area is defined as that geographic area for which a separate and distinct ACP has been prepared, as described in OPA 90. The response community is comprised of the Federal, State, and local Government and industry, including inviting tribal entities to participate. The area exercises are designed to exercise the Government and industry interface for spill response.

The goal of the PREP is to conduct 20 area exercises per year nationwide, 60 within a triennial cycle. This method should ensure that all areas of the country are exercised triennially. Six of the 20 annual area exercises would be led by the Government, that is the Area Committee, with a single industry plan holder as an exercise partner. Industry plan holders would lead the other 14 with the Area Committee as an exercise partner. An exercise design team will develop all of the area exercises. The exercise design team is comprised of representatives from the Federal, State, and local Government agencies, the local response community, and the industry plan holder, if applicable, Tribal entities will be invited to participate. The lead plan holder would coordinate each area exercise. The lead plan holder is the organization (e.g., Government or industry) that is responsible for the primary plan that is exercised in the area exercise. The lead plan holder has the final decision-making authority for the design of the exercise, including the scope and scenario. The USCG or EPA, as Area Committee Chair, are the lead plan holders for the six Government-led exercises, with PHMSA and BSEE participating as appropriate.

A *suggested* mix of participants for the industry-led area exercises would include:

- 1 **A.** Vessels (six exercises)
- 2 **B.** MTR facilities (two exercises)
- 3 **C.** Onshore and certain offshore non-transportation-related facilities (two
- 4 exercises)
- 5 **D.** Pipelines (two exercises)
- 6 **E.** Offshore facilities (two exercises)

7 The area exercises do not have to be large-scale events. The scenario does not always
8 have to involve a WCD scenario. However, at a minimum, the scenario must involve
9 exercise of Tier I WCD capability. The primary purpose of the area exercise is to
10 activate and observe the response infrastructure in the area and the ability of the entire
11 response community to effectively conduct a spill response. The focus should be on the
12 interaction between the responsible party (RP) and the Federal, State, and local
13 Government to exercise both the ACP and the RP's response plan.

14

The following are recommendations for the area exercises:

- A. Each exercise should be approximately 8–12 hours in duration and may be longer if agreed to by the exercise design team.
- B. The area response mechanism would be evaluated in each area exercise, including the Unified Command.
- C. The lead plan holder will have the final decisionmaking authority in the exercise design; however, exercise design should be conducted as a cooperative effort of the entire exercise design team.
- D. The exercise scenario will involve some amount of equipment deployment, which should be determined by the lead plan holder after consulting with the exercise design team.

Area exercise equipment deployment should include the testing and adequacy of various response strategies contained in the plan, including but not limited to:

- A. Protective booming for shoreline, fish, wildlife, and sensitive environmental areas;
- B. Fast-water, open-water, or shallow-water containment and collection; or
- C. Dispersant or ISB operations.

If the exercise spill scenario involves a MMPD or larger spill, a minimum of Tier 1 equipment deployment should be conducted.

Equipment deployment does not need to be conducted simultaneously with the TTX portion of the exercise. It may be done several weeks or even months prior to or after the TTX to allow more efficient allocation of exercise planning and resources.

An industry plan holder that participates in an area exercise will not be required to participate in another area exercise for a minimum of 6 years.

Plan holders are responsible for funding their participation in area exercises.

An evaluation report should be completed no later than 60 days after the completion of the area exercise. The evaluation report is completed by a joint evaluation team. For USCG area exercises, the results will be entered in CGSAILS.

1. Area Exercise Scheduling

Scheduling of area exercises will be done under a nationally coordinated system that involves the Federal, State and local Governments and industry plan holders, and that recognizes the unique needs of specific geographic regions of the country.

2. National Schedule Coordination Committee (NSCC)

The NSCC is responsible for scheduling area exercises. The NSCC is comprised of personnel representing the four Federal regulating agencies:

- | | |
|---------|----------|
| A. USCG | C. PHMSA |
| B. EPA | D. BSEE |

3. Scheduling Process

The NSCC is charged with developing and publishing a proposed area exercise schedule for each upcoming triennial period. This proposed schedule will be posted on the USCG's HOMEPOR Website <<https://homeport.uscg.mil>> and announced in the **Federal Register** annually. The reason the exercises are scheduled at least 3 years in advance is to allow both Area Committees and industry plan holders to allocate sufficient funds and personnel resources to plan and conduct the exercises. The NSCC will solicit comments on the proposed schedule and industry plan holders to lead and participate in the area exercises. It is important to note that the NSCC only proposes which area plans will be exercised over the 3-year period. It is incumbent on the RRTs and Area Committees with jurisdiction over an area to validate the proposed timeframe and to identify the industry plan holder who will participate in the exercise. Each RRT and Area Committee should work with the local industry to identify industry plan holders 3 years in advance of the scheduled exercise. Industry plan holders may also provide input into the scheduling process through the Area Committees.

K. Other Credit Considerations

1. Credit for Spill Response

Plan holders may take credit for responses to actual spills or releases in lieu of conducting internal exercises. The spill response must be evaluated. The plan holder must determine which exercise requirements were met during the spill response. This determination should be based on whether the response effort would meet the objectives of the exercise as listed in the PREP Guidelines. The plan holder must document the response plan core components covered during the response.

The NSCC is responsible for authorizing area exercise credit for responses to actual spills and releases in lieu of conducting area exercises based on the recommendations of the OSC. Area exercise credit should be given to a plan holder for participation in an actual spill or release response if the following circumstances exist:

- A. The response plan was utilized in the response,
- B. The response involved the entire response community in a Unified Command structure,
- C. The objectives of the area exercise were met as outlined in the PREP Guidelines,
- D. The response was evaluated, and
- E. The spill response was properly documented and certified, including:
 - 1. The type and amount of product spilled/released/recovered and
 - 2. Detailed information on how each of the major objectives listed in the report were met.
- F. The names of all OSROs activated, a listing of the equipment deployed, and the following information included:
 - 1. A copy of the initial Incident Action Plan (IAP), Incident Command System (ICS) Form 202, and
 - 2. A discussion of spill abatement procedures utilized.

1 Actual spills must involve, at minimum, deployment of WCD Tier 1 capabilities to be
2 eligible for this credit.

3 **2. Proper Documentation for Self-Certification**

4 Proper documentation for self-certification of an exercise should include, at a minimum,
5 the following information:

- 6 **A.** Type
- 7 **B.** Date and time
- 8 **C.** Description
- 9 **D.** Objectives met
- 10 **E.** Components of the response plan exercised
- 11 **F.** Lessons learned

12 This documentation must be in writing and signed by an authorized representative of
13 the plan holder organization.

14 Sample documentation may be available on applicable NSCC Agency Web sites.

15 As a general rule, exercise records should be completed within 60 days of the exercise,
16 although this may vary depending upon exercise complexity.

17 **L. Special Considerations**

18 **1. Fleet Plans**

19 If an industry plan holder has developed one response plan that covers a fleet of
20 vessels or regional offshore platform operations, this plan holder would only be required
21 to conduct one "set" of exercises for the plan, with the exception of the QI notification
22 exercises, SMFF remote assessment and consultation exercises, and the emergency
23 procedures exercises, which are required for all manned vessels and unmanned
24 barges.

25 **2. Complexes**

26 Complexes are facilities that must meet the requirements of more than one Federal
27 agency. For example, a facility that has oil storage tanks, a pipeline, and a waterfront oil
28 transfer dock is considered to be a complex since it must meet the requirements of
29 EPA, PHMSA, and the USCG.

30 Complexes would only be required to conduct **one** exercise to meet all agency
31 requirements for that particular type of exercise. For example, if a quarterly notification
32 exercise is required by all three agencies regulating the complex, one notification
33 exercise per quarter would satisfy the requirements for all three regulatory agencies.
34 The plan holder should notify the other regulatory agencies upon completion of the
35 exercise.

3. Vessels Serving as Secondary Carriers of Oil

Vessels serving as secondary carriers of oil should comply with the exercise requirements in 33 CFR 155.1045(h).

4. Trans-Alaska Pipeline Authorization Act (TAPAA) Vessels and Facilities

TAPAA vessels and facilities, in addition to complying with the primary exercise requirements, must comply with the additional exercise requirements identified in the vessel and facility response plan regulations at 33 CFR 155.1125(a)(2) and 33 CFR 154.1125(a)(2), respectively.

5. Foreign Vessels Calling Only Occasionally at U.S. Ports

If a vessel plan holder has a VRP prepared with the intent that the vessel would occasionally call on U.S. ports, the vessel plan holder must have an exercise program. If the plan holder is following the PREP Guidelines, all exercises must be conducted at the frequency listed in the PREP Guidelines. The only exception to this requirement is the QI notification exercise, which is only required to be conducted quarterly while operating in U.S. waters, otherwise upon entry into U.S. waters.

If a vessel enters U.S. waters for the first time but intends to continue trading, it must conduct the QI notification exercise immediately, and then begin its exercise program. Since PREP follows the calendar year, the triennial cycle should begin as soon as the vessel enters U.S. waters. The vessel should remain on the calendar year schedule; e.g., the next January 1 would begin Year 2 of the vessel's triennial cycle. In such cases, the plan holder will only be expected to complete 2 full years of internal exercises during the first triennial cycle. For the first year, the plan holder must complete one QI notification and one emergency procedures exercise each quarter during that year. SMT and equipment deployment exercises are recommended as soon as possible, but can be held up to 11 months after the date of the first entry into U.S. waters.

If the vessel only intends to make one voyage into U.S. waters, the vessel must conduct the QI notification exercise immediately upon entry. If the vessel intends to reenter U.S. waters at any time, it must comply with all exercise requirements.

6. Railroad Tank Cars and Motor Vehicle Tank Trucks

There are few individual railroad tank cars or motor vehicle tank trucks transporting sufficient volumes of oil to be subject to the response planning requirements of OPA 90. For additional information on response planning requirements for individual railroad tank cars and motor vehicle tank trucks transporting oil, including training, equipment testing, and drills, see 49 CFR 130. A railroad tank car or a tank truck that transfers oil to or from certain vessels may be considered to be a mobile MTR facility and may be subject to the response planning requirements in 33 CFR 154. The loading and offloading of railroad tank cars and tank trucks at certain non-transportation-related facilities may be covered by response plans prepared by a facility owner or operator subject to the requirements contained in 40 CFR 112.

1 **SECTION 3. U.S. COAST GUARD-REGULATED VESSELS**
2 **AND MARINE TRANSPORTATION-RELATED FACILITIES**

1 **A. Qualified Individual (QI) Notification Exercise**

2 **1. USCG MTR and Mobile MTR Facilities**

Applicability:	Facility
Frequency:	Quarterly
Initiating Authority:	Company policy
Participating Elements:	Facility personnel, QI
Scope:	Exercise communications between facility personnel and QI.
Objectives:	Contact must be made with a QI or designee, as designated in the response plan.
Certification:	Self-certification
Verification:	USCG COTP/FOSC
Records:	
Retention:	3 years
Location:	Records to be kept at the facility
Evaluation:	Self-evaluation
Credit:	Plan holder should take credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

1 2. Manned Vessels

Applicability:	Manned vessels
Frequency:	Quarterly while operating in U.S. waters, including the EEZ; otherwise, upon entry into U.S. waters, not to exceed four times per year. The QI notification exercise would not be required for ships outside U.S. waters.
Initiating Authority:	Master or designee according to plan
Participating Elements:	Vessel personnel, plan-designated shoreside personnel, and a vessel's QI
Scope:	Exercise communication between vessel personnel and QI.
Objectives:	Contact by telephone or electronic messaging and confirmation must be made with a QI or designee as detailed in the plan. Electronic messaging may be used only if the other means are not available.
Certification:	Self-certification
Verification:	USCG COTP/FOSC
Records:	
Retention:	3 years
Location:	Logbook entry indicating time of QI notification as provided at 33 CFR 155.1060(e)(1)
Evaluation:	Owner or operator should conduct review to determine if objectives have been met. Self-evaluation
Credit:	Plan holder should take credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

1 3. Unmanned Barges

Applicability:	Unmanned barge
Frequency:	Quarterly while operating in U.S. waters, including the EEZ; otherwise, upon entry into U.S. waters, not required to exceed four times per year. The QI notification exercise would not be required for barges outside U.S. waters.
Initiating Authority:	Barge owner or operator or towing vessel captain
Participating Elements:	Barge custodian and QI
Scope:	Exercise communication between barge custodian and QI.
Objectives:	<p>Contact by telephone or electronic messaging and confirmation must be made with the QI or designee as detailed in the response plan.</p> <p>Exercises should be conducted randomly to ensure that all barge custodians have an equal chance for participation in the notification exercises.</p>
Certification:	Self-certification
Verification:	USCG COTP/FOSC
Records:	
Retention:	3 years
Location:	Records to be kept on board the barge or with the response plan for the barge
Evaluation:	Self-evaluation
Credit:	Plan holder should take credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

1 B. Remote Assessment and Consultation

2 1. Manned Vessels Carrying Groups I–IV Oils

Applicability:	Manned vessels carrying groups I–IV oils
Frequency:	Quarterly while operating in U.S. waters, including the EEZ; otherwise, upon entry into U.S. waters, not to exceed four times per year. The QI notification exercise would not be required for ships outside U.S. waters.
Initiating Authority:	Vessel owner/operator
Participating Elements:	Vessel personnel and a vessel's plan-designated shoreside personnel, including QI and SMFF providers
Scope:	Exercise plan for communication between plan holder, vessel, QI, and SMFF resource provider to discuss and assess a scenario and determine an initial course of action.
Objectives:	<p>Communication of an SMFF scenario by telephone or electronic messaging. Confirmation of a course of action planned following consultation with the contracted SMFF provider as designated in the plan.</p> <p>If the vessel owner has different primary resource providers for salvage and firefighting, two quarterly exercises per year should involve the salvage resource provider, and the other two should involve the marine firefighting resource provider for remote assessment.</p> <p>NOTE: These exercises are to be conducted separately from the quarterly QI Notification Exercises for OSRO providers.</p>
Certification:	Self-certification
Verification:	USCG
Records:	
Retention:	3 years
Location:	Logbook entry indicating times and results of remote assessment resource provider consultation as provided at 33 CFR 155.1060(e)(1)

Evaluation: Owner or operator should conduct review to determine if objectives have been met.

Self-evaluation

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual SMFF response when these objectives are met, the response is evaluated, and a proper record is generated.

1 2. Unmanned Barges Carrying Groups I–IV Oils

Applicability:	Vessel custodian for unmanned barges carrying groups I–IV oils
Frequency:	Quarterly while operating in U.S. waters, including the EEZ; otherwise, upon entry into U.S. waters, not to exceed four times per year. The QI notification exercise would not be required for ships outside U.S. waters.
Initiating Authority:	Barge plan holder
Participating Elements:	Vessel custodian and a vessel's plan-designated shoreside personnel, including QI and SMFF providers
Scope:	Exercise plan for communication between vessel custodian, plan holder, QI, and SMFF resource provider, according to the VRP, to discuss and assess a scenario and determine an initial course of action.
Objectives:	<p>Communication of an SMFF scenario by telephone or electronic messaging. Confirmation of a course of action planned in consultation with the contracted SMFF provider as designated in the plan.</p> <p>If the vessel owner has different primary resource providers for salvage and firefighting, two quarterly exercises per year should involve the salvage resource provider, and the other two should involve the marine firefighting resource provider for remote assessment.</p> <p>NOTE: These exercises are to be conducted separately from the quarterly QI Notification Exercises for OSRO providers.</p>
Certification:	Self-certification
Verification:	USCG
Records:	
Retention:	3 years
Location:	Logbook entry indicating times and results of remote assessment resource provider consultation as provided at 33 CFR 155.1060(e)(1)
Evaluation:	Owner or operator should conduct review to determine if objectives have been met.

Self-evaluation

Credit:

Plan holder should take credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual SMFF response when these objectives are met, the response is evaluated, and a proper record is generated.

1 C. On Board Emergency Procedures Exercise

2 1. Manned Vessels

Applicability:	Manned vessels
Frequency:	Quarterly
Initiating Authority:	Master or designee according to plan
Participating Elements:	Vessel personnel
Scope:	<p>Exercise the emergency procedures for the vessel crew to mitigate or prevent any discharge or a substantial threat of such discharge of oil resulting from shipboard operational activities associated with internal or external cargo transfers.</p>
Objectives:	<p>Conduct an exercise of the vessel's emergency procedures to ensure crew knowledge of actions to be taken to mitigate a spill. This exercise may consist of a walk-through of the crew's actions.</p> <p>Exercise should involve one or more of the sections of the emergency procedures for spill mitigation. For example:</p> <ul style="list-style-type: none">A. Simulation of response to a collisionB. Simulation of response to an oil spill on the deck of the vesselC. Simulation of response to a vessel fire <p>Annually ensure that spill mitigation procedures for contingencies identified in the response plan have been exercised and, for vessels with SMFF requirements, half of the exercises address emergency procedures with an SMFF component.</p>
Certification:	Self-certification
Verification:	USCG COTP/FOSC
Records:	
Retention:	3 years
Location:	Logbook entry as provided at 33 CFR 155.1060(e)(1)
Evaluation:	Self-evaluation

Credit:

Plan holder should take credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

1 D. Emergency Procedures Exercises

2 1. Unmanned Barges

Applicability:	Unmanned barge(s)
Frequency:	Quarterly
Initiating Authority:	Barge owner or operator
Participating Elements:	Barge custodian
Scope:	Exercise the emergency procedures (33 CFR 155.1040 [a]) to be taken for an oil discharge or substantial threat of such discharge.
Objectives:	Conduct a walk-through of the emergency procedures. Ensure barge custodians know proper actions to take in the event of an oil discharge or substantial threat of such discharge, including incidents requiring SMFF response.
Certification:	Self-certification
Verification:	USCG COTP/FOSC
Records:	
Retention:	3 years
Location:	Records to be kept on board the barge or with the response plan for the barge
Evaluation:	Self-evaluation
Credit:	Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

1 **2. Facilities (Optional)***

Applicability:	Facility
Frequency:	Quarterly
Initiating Authority:	Facility owner or operator
Participating Elements:	Facility personnel
Scope:	Exercise the emergency procedures for the facility to mitigate or prevent any discharge, or a substantial threat of such discharge, of oil resulting from facility operational activities associated with oil transfers.
Objectives:	<p>Conduct an exercise of the facility's emergency procedures to ensure personnel knowledge of actions to be taken to mitigate a spill. This exercise may consist of a walk-through of the emergency procedures.</p> <p>Exercise should involve one or more of the sections of the emergency procedures for spill mitigation. For example, the exercise should involve a simulation of a response to an oil spill.</p> <p>The facility should ensure that spill mitigation procedures for all contingencies at the facility are addressed at some time.</p>
Certification:	Self-certification
Verification:	USCG COTP/FOSC
Records:	
Retention:	3 years
Location:	At each facility
Evaluation:	Self-evaluation
Credit:	Plan holder should take credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

1 **This section describes an optional exercise to provide facilities with an exercise that*
2 *may be conducted unannounced to fulfill the internal unannounced exercise*
3 *requirement.*

4 **E. Spill Management Team Tabletop Exercise (TTX)**

5 **1. USCG MTR/Mobile MTR Facilities**

Applicability: Facility SMT

Frequency: Annually

Initiating Authority: Company policy

Participating Elements: SMT as established in the response plan

Scope: Exercise the SMT's organization, communication, and decisionmaking in managing a spill response.

Objectives: Exercise the SMT in a review of:

- A.** Knowledge of the response plan
- B.** Proper notifications
- C.** Communications system
- D.** Ability to access an OSRO
- E.** Coordination of internal organization personnel with responsibility for spill response
- F.** Annual review of the transition from a local team to a regional, national, and international team as appropriate
- G.** Ability to effectively coordinate spill response activity with the NRS infrastructure (If personnel from the NRS are not participating in the exercise, the SMT should demonstrate knowledge of response coordination with the NRS)
- H.** Ability to access information in the ACP for location of sensitive areas, resources available within the area, unique conditions of area, etc.
- I.** Minimum of one SMT TTX in a triennial cycle must involve simulation of a **WCD** scenario

Certification: Self-certification

Verification: USCG COTP/FOSC

Records:

Retention: 3 years

Location: At each facility

Evaluation: Self-evaluation

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

Plan holders are responsible for ensuring that SMTs are familiar with Area Committees/RRTs and ACPs in every area in which the plan holder operates. While it is not practicable to require an SMT to exercise in every area/region in which they offer coverage each year, each SMT is expected to review ACPs annually and the makeup of Area Committees/RRTs in all areas in which they offer coverage. Self-certification for exercise credit should include SMT certification that the SMT has completed annual review and is familiar with the ACPs and Area Committees/RRTs in all areas in which the plan holder operates.

1 **2. Vessels**

Applicability:	Vessel SMT
Frequency:	Annually
Initiating Authority:	Company policy
Participating Elements:	SMT as established in the response plan
Scope:	Exercise the SMT's organization, communication, and decision-making in managing a spill response.
Objectives:	<p>Exercise the SMT in a review of:</p> <ul style="list-style-type: none">A. Knowledge of the response planB. Proper notificationsC. Communications systemD. Ability to access an OSRO/SMFF providerE. Coordination of internal organization personnel with responsibility for spill prevention and responseF. Annual review of the transition from a local team to a regional, national, and international team as appropriateG. Ability to effectively coordinate spill response activity with the NRS infrastructure (If personnel from the NRS are not participating in the exercise, the SMT should demonstrate knowledge of response coordination with the NRS)H. Ability to access information in the ACP; e.g., location of sensitive areas, resources available within the area, unique conditions of area, etc.I. Minimum of one SMT TTX in a triennial cycle would involve simulation of a WCD scenario
Certification:	Self-certification
Verification:	USCG COTP/FOSC
Records:	
Retention:	3 years
Location:	In accordance with 33 CFR 155.1060(e)(2)

Evaluation:**Self-evaluation****Credit:**

Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

Plan holders are responsible for ensuring that SMTs are familiar with Area Committees and ACPs in every area in which the plan holder operates. While it is not practicable to require an SMT to exercise in every area in which they offer coverage each year, each SMT is expected to review ACPs annually and the makeup of Area Committees in all areas in which they offer coverage. Self-certification for exercise credit should include SMT certification that the SMT has completed annual review and is familiar with the ACPs and Area Committees in all areas in which the plan holder operates.

1 **F. Shore-Based Salvage and Shore-Based Marine Firefighting**
2 **Tabletop Exercises (TTX)**

3 **1. Vessels Carrying Groups I–IV Oils**

Applicability:	Vessel SMFF management team
Frequency:	One salvage and one Marine firefighting exercise per year
Initiating Authority:	Company policy
Participating Elements:	Vessel SMT and salvage management team or Marine firefighting management team as established in the response plan and appropriate to the scenario
Scope:	Exercise the management team's organization, communication, and decisionmaking in managing a salvage or Marine firefighting response.
Objectives:	<p>Exercise the salvage or Marine firefighting management team in a review of:</p> <ul style="list-style-type: none">A. Knowledge of the response planB. Proper notificationsC. Communications systemD. Ability to access an SMFF providerE. Coordination of internal organization personnel with responsibility for spill prevention and salvage or fire responseF. Annual review of the transition from a local team to a commercial, regional, national, and international team as appropriateG. Ability to effectively coordinate response activity with the NRS infrastructure (If personnel from the NRS are not participating in the exercise, the SMT should demonstrate knowledge of response coordination with the NRS)H. Ability to access information in the ACP for resources available within the area, unique conditions of the area, etc.
Certification:	Self-certification
Verification:	USCG COTP/FOSC
Records:	
Retention:	3 years
Location:	In accordance with 33 CFR 155.1060(e)(2)

Evaluation:

Self-evaluation

Credit:

Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual salvage or Marine firefighting response when these objectives are met, the response is evaluated, and a proper record is generated.

1 G. Equipment Deployment Exercises

2 1. USCG MTR and Mobile MTR Facilities: Facility Owned and Operated 3 Response Equipment

Applicability:	Facilities with facility owned and operated response equipment
Frequency:	Semiannually
Initiating Authority:	Company policy
Participating Elements:	Facility personnel
Scope:	<p>Deploy and operate facility owned and operated response equipment identified in the response plan. The equipment to be deployed would be either (1) the minimum amount of equipment for deployment as described in "Guiding Principles" or (2) the equipment necessary to respond to an AMPD at the facility, whichever is less.</p> <p>All of the facility's personnel involved in equipment deployment operations must be included in a comprehensive training program and a comprehensive maintenance program. Credit should be taken for deployment conducted during training. The maintenance program must ensure that the equipment is periodically inspected and maintained in good operating condition in accordance with the manufacturer's recommendations and best commercial practices. All inspection and maintenance must be documented by the owner.</p>
Objectives:	<p>Demonstrate ability of facility personnel to deploy and operate equipment.</p> <p>At least annually, conduct deployment of dispersant application resources, if applicable.</p> <p>Ensure equipment is in proper working order.</p> <p>Deployment should also include testing ACP containment, protection, and diversion strategies.</p>
Certification:	Self-certification
Verification:	USCG COTP/FOSC

Records:

Retention: 3 years

Location: Records to be kept at facility

Evaluation: Self-evaluation

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

- 1 **Note:** If a facility with facility owned and operated equipment also identifies OSRO
- 2 equipment in its response plan, the OSRO equipment must also be deployed and
- 3 operated in accordance with the equipment deployment requirements for OSRO-owned
- 4 equipment.

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1 2. USCG MTR and Mobile MTR Facilities: OSRO Response Equipment

Applicability:	Facilities with OSRO response equipment cited in their response plan
Frequency:	Annually
Initiating Authority:	Company policy
Participating Elements:	Facility owner or operator and OSRO
Scope:	<p>Deploy and operate response equipment identified in the response plan. The equipment to be deployed would be the minimum amount of equipment as described in "Guiding Principles."</p> <p>All OSRO personnel involved in equipment deployment operations must be included in a comprehensive training program and a maintenance program. Credit should be taken for equipment deployment conducted during training. The maintenance program must ensure that the equipment is periodically inspected and maintained in good operating condition in accordance with the manufacturers' recommendations and best commercial practices. The facility owner or operator must ensure that inspection and maintenance by the OSRO is documented. The OSRO must provide inspection and maintenance information to the owner or operator.</p> <p>Plan holders must ensure that when a regional OSRO is identified in the response plan, the OSRO conducts annual equipment deployment exercises in each operating environment for each USCG Contingency Planning Area.</p>
Objectives:	<p>Demonstrate the ability of the personnel to deploy and operate equipment.</p> <p>At least annually, conduct deployment of dispersant application resources, if applicable.</p> <p>Ensure the response equipment is in proper working order.</p> <p>Whenever feasible, equipment deployment should also include testing ACP containment, protection, and diversion strategies.</p>
Certification:	The facility owner or operator should ensure that the OSRO identified in the response plan provides adequate documentation that the requirements for this exercise have been met.
Verification:	USCG COTP/FOSC
Records:	

Retention:	3 years
Location:	Records to be kept at the facility
Evaluation:	Self-evaluation
Credits:	Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when the objectives are met, the response is evaluated, and a proper record is generated.

1 3. Vessels

Applicability:	Vessels
Frequency:	Annual OSRO exercise and Annual SMFF exercise
Initiating Authority:	Company policy
Participating Elements:	Vessel owner or operator and OSRO or SMFF provider
Scope:	<p>Deploy and operate OSRO or SMFF response equipment identified in the response plan. The minimum amount of equipment to deploy during OSRO exercises is described in "Guiding Principles." There is no minimum amount of equipment prescribed for SMFF exercises.</p> <p>All OSRO personnel involved in equipment deployment operations must be included in a comprehensive training program and a comprehensive maintenance program. Credit should be taken for equipment deployment conducted during training. The maintenance program must ensure that the equipment is periodically inspected and maintained in good operating condition in accordance with the manufacturer's recommendations and best commercial practices. The vessel owner or operator must ensure that equipment inspection and maintenance is documented. OSROs must provide inspection and maintenance information to the vessel owner or operator.</p> <p>SMFF providers are encouraged to develop and implement a comprehensive training program for their personnel, and a comprehensive maintenance program for their equipment, which should be made available to vessel owners and operators.</p> <p>Plan holders must ensure that when a regional OSRO or SMFF provider is identified in the response plan, the OSRO or SMFF provider conducts annual equipment deployment exercises in each operating environment for each USCG Contingency Planning Area.</p>
Objective:	<p>Demonstrate the ability of the personnel to deploy and operate response equipment.</p> <p>At least annually, conduct deployment of dispersant application resources, if applicable.</p> <p>Ensure the response equipment is in proper working order.</p> <p>Whenever feasible, OSRO equipment deployment should also include validating ACP response strategies.</p>
Certification:	The vessel owner or operator should ensure that the OSRO and SMFF resource providers identified in the response plan provide adequate documentation that the requirements for this exercise

have been met.

Verification: USCG COTP/FOSC

Records:

Retention: 3 years

Location: In accordance with 33 CFR 155.1060 (e)(2)

Evaluation: Self-evaluation

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill or SMFF response when the objectives are met, the response is evaluated, and a proper record is generated.

1 H. Government-Initiated Unannounced Exercises (GIUEs)

2 1. Vessels, MTR, and Mobile MTR Facility Response Plan Holders

Applicability:	Vessel and MTR facility response plan holders within the area
Frequency:	Triennially (if successfully completed): A facility deemed by the USCG/EPA not to have successfully completed the exercise may be required to participate in another GIUE at the discretion of the exercising agency. (Plan holders who have successfully completed a PREP GIUE will not be required to participate in another one for at least 36 months from the date of the exercise.)
Initiating Authority:	USCG
Participating Elements:	Vessel, MTR, and Mobile MTR facility response plan holders
Scope:	<p>Unannounced exercises are limited to a maximum of four exercises per area per year.</p> <p>Exercises are limited to approximately 4 hours in duration.</p> <p>Exercises must involve response to an AMPD scenario or SMFF incident.</p>
Objectives:	<p>Conduct proper notifications and equipment deployment to respond to an unannounced scenario of an AMPD. Demonstrate the response is:</p> <ul style="list-style-type: none">A. Timely: As a general rule, the regulatory planning standard is containment equipment (e.g., booms) on scene within 1 hour of notification and recovery equipment (e.g., skimmers and temporary storage) on scene within 2 hours. Therefore, in a GIUE, a plan holder should be able to initiate a simulated cleanup or SMFF response within approximately 2 hours of exercise commencement.B. Conducted with adequate amount of equipment deployed for the given scenario.C. Properly conducted. <p>Whenever feasible, OSRO equipment deployment should also include testing ACP containment, protection, and diversion strategies.</p>
Certification:	USCG COTP/FOSC
Verification:	USCG COTP/FOSC
Records:	
Retention:	3 years

U.S. COAST GUARD–REGULATED VESSELS AND MARINE TRANSPORTATION-RELATED FACILITIES

Location:	For facilities, at the facility For vessels, in accordance with 33 CFR 155.1060(e)(2)
Evaluation:	Evaluation to be conducted by initiating agency
Credit:	Credit may be granted by the initiating authority for an actual spill response when the PREP objectives are met, the response is evaluated by the initiating authority, and a proper record is generated. Plan holders participating in this exercise may take credit for notification and equipment deployment exercises if criteria for those exercises are met, the response is evaluated by the plan holder, and a proper record is generated.

SECTION 4. EPA-REGULATED ONSHORE AND CERTAIN NON-TRANSPORTATION-RELATED FACILITIES LANDWARD OF THE COASTLINE

PREP Guidelines do not create binding legal requirements.

While the PREP Guidelines have been developed with the regulated community, they cannot be considered to be legally binding substantive rules. *Plan holders can accept the PREP Guidelines to fulfill the exercise requirements of OPA90.* An alternative program can also be acceptable subject to approval by the Regional Administrator. (See 40 CFR 112.21.) Either the PREP Guidelines or the EPA-approved exercise program developed by the plan holder become binding when referenced in the submitted response plan.

1 A. Qualified Individual (QI) Notification Exercises

2 1. EPA-Regulated Facilities

Applicability:	Facility
Frequency:	Quarterly
Initiating Authority:	Company policy
Participating Elements:	Facility personnel and QI
Scope:	Exercise communications between facility personnel and QI.
Objectives:	Contact must be made with a QI or designee as designated in the response plan.
Certification:	Self-certification
Verification:	EPA
Records:	
Retention:	5 years
Location:	Records to be kept at the facility
Evaluation:	Self-evaluation
Credit:	Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

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1 B. Emergency Procedures Exercises

2 1. Facilities (Optional)*

Applicability:	Facility
Frequency:	Quarterly
Initiating Authority:	Facility owner or operator
Participating Elements:	Facility personnel
Scope:	Exercise the emergency procedures for the facility to mitigate or prevent any discharge or a substantial threat of such discharge of oil resulting from facility operational activities associated with oil transfers.
Objectives:	<p>Conduct an exercise of the facility's emergency procedures to ensure personnel knowledge of actions to be taken to mitigate a spill. This exercise may consist of a walk-through of the emergency procedures.</p> <p>Exercise should involve one or more of the sections of the emergency procedures for spill mitigation; e.g., the exercise may involve a simulation of a response to an oil spill.</p> <p>Facility should ensure that spill mitigation procedures for all contingencies at the facility are addressed at some time.</p>
Certification:	Self-certification
Verification:	EPA
Records:	
Retention:	5 years
Location:	At each facility
Evaluation:	Self-evaluation

3

Credit:

Plan holder should take credit for this exercise when conducted in conjunction with other exercises, as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

- 1 **This is offered as an optional exercise to provide facilities with an exercise that may be*
- 2 *conducted **unannounced** to fulfill the internal unannounced exercise requirement.*
- 3

1 C. Spill Management Team (SMT) Tabletop Exercise (TTX)

2 1. EPA-Regulated Facilities

Applicability:	Facility SMT
Frequency:	Annually
Initiating Authority:	Company policy
Participating Elements:	SMT as established in the response plan
Scope:	Exercise the SMT's organization, communication, and decision making in managing a spill response.
Objectives:	<p>Exercise the SMT in a review of:</p> <ul style="list-style-type: none">A. Knowledge of the response planB. Proper notificationsC. Communications systemD. Ability to access an OSROE. Coordination of internal organization personnel with responsibility for spill responseF. Annual review of the transition from a local team to a regional, national, and international team as appropriateG. Ability to effectively coordinate spill response activity with the NRS infrastructure (If personnel from the NRS are not participating in the exercise, the SMT should demonstrate knowledge of response coordination with the NRS)H. Ability to access information in ACP for location of sensitive areas, resources available within the area, unique conditions of area, etc.I. Minimum of one SMT TTX in a triennial cycle would involve simulation of a WCD scenario
Certification:	Self-certification
Verification:	EPA
Records:	
Retention:	5 years
Location:	At each facility
Evaluation:	Self-evaluation
Credit:	Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is

EPA-REGULATED ONSHORE AND CERTAIN NON-TRANSPORTATION-RELATED
FACILITIES LANDWARD OF THE COASTLINE

generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

1 D. Equipment Deployment Exercises

2 1. EPA-Regulated Facilities: Facility Owned and Operated Response Equipment

Applicability:	Facilities with facility owned and operated response equipment
Frequency:	Semiannually
Initiating Authority:	Company policy
Participating Elements:	Facility personnel
Scope:	<p>Deploy and operate facility owned and operated response equipment identified in the response plan. The equipment to be deployed would be either (1) the minimum amount of equipment for deployment as described in "Guiding Principles" or (2) the equipment necessary to respond to a small discharge at the facility, whichever is less.</p> <p>All of the facility personnel involved in equipment deployment operations must be included in a comprehensive training program and a comprehensive maintenance program. Credit should be taken for deployment conducted during training. The maintenance program must ensure that the equipment is periodically inspected and maintained in good operating condition in accordance with the manufacturer's recommendations and best commercial practices. All inspection and maintenance must be documented by the owner.</p>
Objectives:	<p>Demonstrate ability of facility personnel to deploy and operate equipment.</p> <p>Ensure equipment is in proper working order.</p>
Certification:	Self-certification
Verification:	EPA
Records:	
Retention:	5 years
Location:	Records to be kept at the facility
Evaluation	Self-evaluation

3

Credit:

Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

- 1 **Note:** If a facility with facility owned and operated equipment also identifies OSRO
- 2 equipment in its response plan, the OSRO equipment must also be deployed and
- 3 operated in accordance with the equipment deployment requirements for OSRO-owned
- 4 equipment.

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1 2. EPA-Regulated Facilities: OSRO Response Equipment

Applicability:	Facilities with OSRO response equipment cited in their response plan
Frequency:	Annually
Initiating Authority:	Company policy
Participating Elements:	Facility owner or operator and OSRO
Scope:	<p>Deploy and operate response equipment identified in the response plan. The equipment to be deployed would be the minimum amount of equipment for deployment as described in "Guiding Principles."</p> <p>All of the OSRO personnel involved in equipment deployment operations must be included in a comprehensive training program and a comprehensive maintenance program. Credit should be taken for equipment deployment conducted during training. The maintenance program must ensure that the equipment is periodically inspected and maintained in good operating condition in accordance with the manufacturer's recommendations and best commercial practices. The facility owner or operator must ensure that inspection and maintenance by the OSRO is documented. The OSRO must provide inspection and maintenance information to the owner or operator.</p> <p>Plan holders must ensure that when a regional OSRO is identified in the response plan, the OSRO conducts annual equipment deployment exercises in each operating environment for each CG or EPA Contingency Planning Area, or EPA subarea (where identified).</p>
Objectives:	<p>Demonstrate the ability of the personnel to deploy and operate response equipment.</p> <p>Ensure the response equipment is in proper working order.</p>
Certification:	The facility owner or operator should ensure that the OSRO identified in the response plan provides adequate documentation that the requirements for this exercise have been met.
Verification:	EPA

2

Records:

Retention: 5 years

Location: Kept at the facility

Evaluation: Self-evaluation

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when the objectives are met, the response is evaluated, and a proper record is generated.

1 E. Government-Initiated Unannounced Exercises (GIUEs)

2 1. EPA-Regulated Facility Response Plan Holders

Applicability:	EPA-regulated facility response plan holders within the region.
Frequency:	Triennially (if successfully completed): A facility deemed by the USCG/EPA not to have successfully completed the exercise may be required to participate in another GIUE at the discretion of the exercising agency. (Plan holders who have successfully completed a PREP GIUE will not be required to participate in another one for at least 36 months from the date of the exercise.)
Initiating Authority:	EPA
Participating Elements:	EPA-regulated facility response plan holders
Scope:	<p>Unannounced exercises are limited to a maximum of 10 percent of response plan holders per EPA region per year.</p> <p>Exercises are limited to approximately 4 hours in duration.</p> <p>Exercises should involve response to a small discharge scenario (assume 2,100 gallons outside secondary containment and discharged into or on navigable waters and adjoining shorelines).</p> <p>Exercise would involve deployment of response equipment identified in the facility response plan to respond to spill scenario.</p>
Objectives:	<p>Conduct proper notifications to respond to unannounced scenario of a small discharge.</p> <p>Demonstrate that the response is:</p> <ul style="list-style-type: none">A. Timely, as defined in Section 1 of these guidelinesB. Conducted with adequate amount of equipment for the scenarioC. Properly conducted
Certification:	EPA
Verification:	EPA

Records:

Retention: 5 years

Location: Kept at the facility

Evaluation: Evaluation to be conducted by initiating agency

Credit: Credit may be granted by the initiating authority for an actual spill response when the PREP objectives are met, the response is evaluated by the initiating authority, and a proper record is generated. Plan holders participating in this exercise may take credit for notification and equipment deployment exercises if criteria for those exercises are met, the response is evaluated by the plan holder, and a proper record is generated.

SECTION 5. ONSHORE TRANSPORTATION-RELATED PIPELINES

PREP Guidelines do not create binding legal requirements.

While the PREP Guidelines have been developed with the regulated community, they cannot be considered to be legally binding substantive rules. Plan holders can accept the PREP Guidelines to fulfill the exercise requirements of OPA90. An alternative program can also be acceptable subject to approval by the PHMSA's Office of Pipeline Safety. (See 49 CFR 194.107(c)(1)[ix].) Either the PREP Guidelines or the PHMSA-approved exercise program developed by the plan holder become binding when referenced in the submitted response plan.

1 A. Owner or Operator Internal Notification Exercises

2 1. Onshore Transportation-Related Pipelines

Applicability:	Pipeline owner or operator
Frequency:	As indicated by the response plan and, at a minimum, consistent with the triennial cycle (quarterly)
Party Initiating Exercise:	As indicated in response plan NOTE: PHMSA may have the operator conduct an Internal Notification Exercise as part of a regulatory inspection of the facility.
Participants:	Facility response personnel and the facility's QI
Scope:	Exercise the notification process between key facility personnel and the QI to demonstrate notification processes and the accessibility of the QI.
Objectives:	Contact by telephone or electronic messaging and confirmation established as indicated in response plan.
Format:	As indicated in response plan
Certification:	Self-certification as indicated in response plan. Each plan should have a written description of the company's certification process.
Verification:	Verification conducted by PHMSA during regular inspections* or PHMSA TTXs.
Records:	
Retention:	3 years
Location:	Owner or operator shall retain records as indicated in response plan.
Credit:	Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

3 **NOTE:** Verification will not be done by inspections in the near term.

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1 B. Internal Tabletop (TTX) Exercises

2 1. Onshore Transportation-Related Pipelines

Applicability:	Pipeline owner or operator
Frequency:	As indicated by the response plan and, at a minimum, consistent with the triennial cycle (annually)
Party Initiating Exercise:	As indicated in response plan
Participants:	Designated spill emergency response team members Pipeline owners and operators are encouraged to notify their PHMSA regional office at least a month in advance of conducting their PREP exercises. When possible, PHMSA will participate and evaluate their exercise.
Scope:	Demonstration of the response team's ability to organize, communicate, and make strategic decisions regarding population and environmental protection during a spill event.
Objectives:	Designated emergency response team members should demonstrate: <ul style="list-style-type: none">A. Knowledge of the facility response planB. Ability to organize team members to effectively interface with a unified commandC. Communication capabilityD. Coordination for response capability as outlined in response plan
Format:	Internal TTX as outlined in response plan
Certification:	Self-certification as indicated in response plan or as defined in the "Guiding Principles" section of this document, whichever is more stringent. Each plan should have a written description of the company's certification process.
Verification:	Verification conducted by PHMSA during regular inspections* or PHMSA TTXs.
Records:	
Retention:	3 years
Location:	Owner or operator shall retain records as indicated in response plan.
Credits:	Plan holders should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is

generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

1 **Verification will not be done by inspections in the near term.*
2

1 C. Owner/Operator Equipment Deployment Exercises

2 1. Onshore Transportation-Related Pipelines

Applicability: Pipeline owner or operator

Frequency: As indicated by the response plan and, at a minimum, as consistent with the triennial cycle (annually)

NOTE: *The number of equipment deployment exercises should be such that equipment and personnel assigned to each response zone are exercised at least once per year. If the same personnel and equipment respond to multiple zones, they need only exercise once per year. If different personnel and equipment respond to various response zones, each must participate in an annual equipment deployment exercise.*

Party Initiating Exercise: As indicated in response plan

Participants: Designated spill emergency response team members
Pipeline owners and operators are encouraged to notify their PHMSA regional office at least a month in advance of conducting their PREP exercises. When possible, PHMSA will participate and evaluate their exercise.

Scope: Demonstrate the ability to deploy spill response equipment* identified in the FRP.

Objectives: Designated emergency response personnel should demonstrate the ability to:

- A.** Organize
- B.** Deploy and operate representative types of key response equipment as described in response plan

Format: Announced deployment exercise indicated in response plan

Certification: Self-certification as indicated in response plan. Each plan should have a written description of the company's certification process.

Verification: Verification conducted by PHMSA during regular inspections** or PHMSA TTXs

Records:

Retention: 3 years

Location: Owner or operator shall retain records as indicated in response plan.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response

when these objectives are met, the response is evaluated, and a proper record is generated.

- 1 **May consist entirely of operator-owned equipment, or a combination of OSRO and*
- 2 *operator equipment.*
- 3 ***Verification will not be done by inspection in the near term.*

1 D. Unannounced Exercises

2 1. Onshore Transportation-Related Pipelines

Applicability:	Pipeline owner/operator
Frequency:	<p>PHMSA does not routinely conduct unannounced exercises, but PREP Guidelines require that operators conduct at least one of their equipment deployment or internal TTXs unannounced annually. (See Section 2.)</p> <p>PHMSA has and reserves the authority to conduct and require an operator to participate in a PHMSA GIUE.</p>
Party Initiating Exercise:	PHMSA
Participants:	<p>Operator-designated spill emergency response team members</p> <p>Operations staff</p> <p>On-Scene Coordinator (optional)</p> <p>Federal, State, and other Government agencies (optional)</p>
Scope:	Demonstrate the ability to respond to a WCD spill event.
Objectives:	Designated emergency response team members should demonstrate adequate knowledge and understanding of their facility response plan and the ability to organize, communicate, coordinate, and respond in accordance with that plan. Initiate and demonstrate use of a unified command, consistent with the National Incident Management System.
Format:	<p>Unannounced tabletop exercise to discuss strategic issues.</p> <p>PHMSA will provide the owner or operator the following information at least 10 working days in advance: (1) Date, time, and location of exercise; (2) expected exercise duration; and (3) response zone to be exercised.</p> <p>On the day of the exercise, the pipeline owner or operator will be provided the scenario and post-spill events. This information will be used to explore and discuss strategic issues that will help operators evaluate their response plans.</p>

Certification:	PHMSA will evaluate the conduct and achievement of objectives for the exercises. PHMSA will provide certification of the exercise to the owner/operator.
Verification:	PHMSA
Records:	
Retention:	3 years
Location:	Owner or operator shall retain records as indicated in response plan.
Credit:	Plan holder should take credit for a PHMSA-initiated exercise that PHMSA certifies as successfully completed.

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SECTION 6. OFFSHORE FACILITIES

1 A. Notification Exercises

2 1. Offshore Facilities

Applicability:	24-hour manned offshore facilities
Frequency:	On an annual basis and within 2 weeks after initiating operations on a 24-hour manned facility. For mobile offshore drilling units (MODUs) that will be engaged in drilling or downhole operations, within 2 weeks after movement on location and annually thereafter while at this location, as applicable.
Initiating Authority:	Owner or operator
Participating Elements:	Facility personnel and QI
Scope:	Exercise and test communications between personnel on each facility manned on a 24-hour basis and QI; information to be provided in the event of a spill must be simulated during this exercise.
Objectives:	<p>Voice contact must be made with the QI.</p> <p>All pertinent information must be communicated in a timely manner as outlined within the approved response plan and include:</p> <ul style="list-style-type: none">A. Incident location: Indicate county, State, and latitude and longitude of release.B. Released material: Indicate name of material released, quantity released, and quantity in the water.C. Brief description of incidentD. Incident details: Include platform rig name or platform letter, location area ID, block number, OCS lease number or State lease number.E. Sheen information: Include color, direction traveling, size, leading edge.F. Impact: Indicate if fire is involved and, if so, whether it is extinguished; document injuries or fatalities and if evacuation(s) occurred.G. Remedial action: Indicate if source is secure and whether steps have been

taken for source control or spill response.

H. Weather:

Describe weather conditions, wind speed, wave conditions, speed and direction of currents.

I. Agency notifications:

Indicate any local/State/Federal agencies that have been notified.

J. Additional Information:

Describe threats to personnel, biological resources, or the environment and any other pertinent information not previously covered.

Corrections must be identified and incorporated into your oil spill response plan to address any problems encountered while conducting the notification exercise.

Certification:	Self-certification
Verification:	Verification by BSEE; records must be available upon request.
Records:	
Retention:	3 years
Location:	Records are to be maintained at the facility or at a corporate location designated in the spill response plan.
Evaluation:	Self-evaluation of objectives
Credit:	Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated and retained.

1 B. UNANNOUNCED EXERCISES

2 1. Offshore Facilities

Applicability: Offshore facilities

Frequency: Frequency will be determined by the BSEE Chief, OSRD. A response plan holder will generally not face an agency unannounced exercise more than once every 3 years, unless the results of previous exercises or responses to real time incidents warrant more frequent evaluation or based upon differing BSEE Regional Office requirements.

Initiating Authority: BSEE

Participating Elements: Facility personnel, QI, SMT, OSRO, spill response operating team, spill response containment and control equipment providers, contractors, State and local government and other Federal agencies (optional).

Scope: Exercise will require that the owner or operator respond to a spill scenario posed by the BSEE Chief, OSRD, or designee. These unannounced exercises may consist of either (1) an SMT TTX, (2) a deployment exercise utilizing equipment staged onshore and/or offshore including subsea containment and control equipment if applicable, or (3) an SMT TTX combined with deployment of equipment staged onshore and/or offshore.

Objectives:

A. SMT TTX

The owner or operator will be requested by BSEE to exercise a select combination of the core components of the plan holders' response plan, as outlined within Appendix A of the PREP Guidelines. Each drill will utilize an unannounced scenario that will be designed to test the selected core components.

In addition, effective demonstration of any of the following components may be included in the unannounced scenario for the exercise:

1. Demonstrate the ability to track and monitor the spill.
2. Demonstrate response plan knowledge.
3. Demonstrate the ability to access information in ACP for location of sensitive areas, resources available within the area, unique conditions of area, recommended protection strategies, etc.
4. Demonstrate the ability, through the appropriate procurement of resources and planning, to utilize the best available measures, equipment, and techniques necessary to protect the onshore and

offshore potentially impacted resources. This may include subsea well containment and control equipment if applicable.

B. Deployment exercise utilizing equipment staged onshore and/or offshore

The deployment exercise is intended to:

1. Demonstrate ability of spill response personnel to conduct timely and proper deployment and operation of equipment in a safe manner.
2. Demonstrate the ability of spill response personnel to employ response techniques and methodologies that would enhance spill response capability and/or serve to better protect environmentally sensitive or economic resources.
3. Evaluate the effective operation of the deployed equipment; i.e., the operating condition and the ability to demonstrate and achieve the equipment's defined operating specifications during the exercise.
4. Evaluate deployment strategies under the unannounced spill scenario.

C. SMT TTX combined with deployment of equipment staged onshore and/or offshore

1. The objectives as outlined in numbers 1 and 2 of this section.

Certification: BSEE

Verification: BSEE

Records:

Retention: 3 years

Location: BSEE will maintain records at the BSEE Regional Office. The owner or operator will maintain records at a corporate location identified in the approved spill response plan.

Evaluation:

Evaluation of objectives to be conducted by BSEE

Credits:

Plan holder may receive credit for other required exercises if the unannounced exercise is successfully completed, objectives of the other exercise(s) are met, and a proper record is generated.

1 C. Spill Management Team Tabletop Exercise (TTX)

2 1. Offshore Facilities

Applicability:	SMT
Frequency:	Annually
Initiating Authority:	Owner or operator
Participating Elements:	SMT as established in the spill response plan
Scope:	For each response plan identified, the SMT must be exercised annually.
Objectives:	<p>Exercise the SMT's organization, communication, and decision-making in managing a spill response to an unannounced scenario.</p> <p>Exercise a select combination of the core components of a spill response plan as outlined within Appendix A of the PREP Guidelines. Design the exercise to test for the selected core components. For each triennial cycle (every 3 years), each of the applicable core components (outlined in Appendix A) needs to be exercised at least once.</p> <p>In addition, effective demonstration of any of the following components may be included in the scenario for the exercise:</p> <ul style="list-style-type: none">A. Ability to track and monitor the spill and to properly map the spill information necessary to respond to the unannounced spill scenario.B. Knowledge of response plan.C. Ability to access information in ACP for location of sensitive areas, resources available within the area, unique conditions of area, recommended protection strategies, etc.D. Ability, through the appropriate procurement of resources and planning, to utilize the best available measures, equipment, and techniques necessary to protect the onshore and offshore potentially impacted resources. This may include subsea well containment and control equipment if applicable.E. Identification of corrections to address any problems encountered while conducting the exercise and the incorporation of these corrections into the spill response plan.
Certification:	Self-certification
Verification:	Verification by BSEE; records must be available upon request.

Records:

Retention: 3 years

Location: Records are to be maintained at a corporate location designated in the spill response plan.

Evaluation: Self-evaluation

BSEE may evaluate if the exercise is witnessed.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

1 D. Equipment Deployment Exercises

2 1. Offshore Facilities: Equipment Staged Offshore

Applicability:	OSRO or owner or operator response equipment required to be or voluntarily staged offshore
Frequency:	<p>On a semiannual basis and within 30 days after initial equipment placement. Notification of date equipment will be staged offshore must be made to BSEE Chief, OSRD, or designee prior to equipment placement.</p> <p><i>For wells being drilled from MODUs, at least once while the MODU is on each location and within 30 days of beginning operations if staged response equipment is required by the BSEE Chief, OSRD, or voluntarily placed by the owner operator.</i></p>
Initiating Authority:	OSRO, or owner or operator
Participating Elements:	Facility or spill response operating team identified within the response plan
Scope:	Deploy and operate response equipment that is staged offshore and identified in the response plan. Each type of this equipment is to be deployed annually. Each type need not be deployed at each exercise.
Objectives:	<p>Demonstrate ability of spill response personnel to conduct timely and proper deployment and operation of equipment in a safe manner.</p> <p>Demonstrate the ability of spill response personnel to employ response techniques and methodologies that would enhance spill response capability and/or serve to protect environmentally sensitive or economic resources.</p> <p>Evaluate the effective operation of the deployed equipment; i.e., the operating condition and the ability to demonstrate and achieve the equipment's defined operating specifications during the exercise.</p> <p>Evaluate deployment strategies under various spill scenarios.</p> <p>Identify corrections needed to address any problems encountered while conducting the exercise and the incorporation of these corrections into the spill response plan.</p>
Certification:	Self-certification
Verification:	Verification by BSEE; records must be available upon request.
Records:	
Retention:	3 years

Location:	Records are to be kept at the OSRO or at the facility or a corporate location designated in approved response plan for owner or operator equipment.
Evaluation:	Self-evaluation of objectives; BSEE may evaluate if the exercise is witnessed.
Credit:	Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

1 2. Offshore Facilities: Equipment Staged Onshore

Applicability:	OSRO or owner or operator response equipment stored at an onshore location that is cited in a spill response plan submitted to BSEE for review and approval
Frequency:	On an annual basis and within 30 days after initial placement per type of equipment
Initiating Authority:	OSRO, or owner or operator
Participating Elements:	OSRO, spill response operating team, and/or owner or operator personnel
Scope:	Deploy and operate response equipment that is stored onshore and identified in the response plan. Each type of equipment must be exercised during each triennial period. It is not necessary to deploy each piece of equipment.
Objectives:	<p>Demonstrate ability of spill response personnel to conduct timely and proper deployment and operation of equipment in a safe manner.</p> <p>Demonstrate the ability of spill response personnel to employ response techniques and methodologies that would enhance spill response capability and/or serve to protect environmentally sensitive or economic resources.</p> <p>Evaluate the effective operation of the deployed equipment; i.e., the operating condition and the ability to demonstrate and achieve the equipment's defined operating specifications during the exercise.</p> <p>Evaluate deployment strategies under various spill scenarios.</p> <p>Identify corrections needed to address any problems encountered while conducting the exercise and the incorporation of these corrections into the spill response plan.</p>
Certification:	Self-certification: OSRO for OSRO equipment and owner or operator for owner or operator equipment
Verification:	Verification by BSEE; records must be available upon request.

Records:

Retention: 3 years

Location: Records are to be kept at the OSRO or at the facility or a corporate location designated in approved response plan for owner or operator equipment.

Evaluation: Self-evaluation of objectives; BSEE may evaluate if the exercise is witnessed.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

1 3. Offshore Facilities: Subsea Containment and Control Equipment

Applicability:	Contractor or owner or operator response equipment cited within a BSEE-regulated facility response plan
Frequency:	As deemed necessary by the BSEE Chief, OSD. If the exercise is voluntarily conducted by a subsea containment and control equipment provider, the BSEE Chief, OSD, shall be provided 60 days' notice prior to the date of the planned exercise.
Initiating Authority:	BSEE Chief, OSD; or subsea containment and control equipment provider; or owner or operator
Participating Elements:	Subsea containment and control equipment providers, contractors, facility personnel, QIs, State and local government, and other Federal agencies and/or owner or operator personnel
Scope:	Deploy, operate, and test containment and control equipment that is identified in the response plan as requested by the BSEE Chief, OSD, or as deemed necessary by an owner/operator or the containment and control equipment provider. If the exercise is initiated by the BSEE Chief, OSD, the parameters (e.g., location, onshore or offshore, water depth, types of equipment to be tested, test protocols) for the test will be provided to the subsea containment and control equipment providers by the BSEE Chief, OSD.
Objectives:	<p>Demonstrate ability of containment and control personnel to conduct timely and proper deployment and operation of equipment in a safe manner.</p> <p>Evaluate the ability to procure in a timely manner all of the support equipment and services necessary to ensure an effective well containment and control response.</p> <p>Evaluate the effective operation of the deployed equipment; i.e., the operating condition and the ability to demonstrate and achieve the equipment's defined operating specifications during the exercise.</p> <p>Evaluate deployment strategies under various spill release scenarios.</p> <p>Identify corrections needed to address any problems encountered while conducting the exercise and the incorporation of these corrections into the spill response plan or equipment improvements.</p>
Certification:	BSEE
Verification:	BSEE

Records:

Retention: Indefinite

Location: BSEE will maintain records at the BSEE Regional Office or as directed by records management protocols. The owner or operator and/or containment and control equipment provider will also maintain records at a corporate location identified in the approved spill response plan.

Evaluation: Evaluation of objectives to be conducted by BSEE

Credits: Plan holder may not receive credit for other required exercises.

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SECTION 7. AREA EXERCISES

1 A. Notification Exercise

2 1. Area

Applicability:	Area
Frequency:	Quarterly
Initiating Authority:	OSC
Participating Elements:	Key elements of the Unified Command (appropriate Federal, State and local government agencies)
Scope:	Exercise and test communication between the OSC and key elements of the Unified Command.
Objectives:	<p>Ensure that the key elements of the Unified Command know who to call in the event of a discharge, including discharges with SMFF implications, within the area.</p> <p>Ensure contact by telephone or electronic messaging and that confirmation is made between the OSC and key elements of the Unified Command.</p>
Certification:	Self-certification
Verification:	Verification to be conducted by the district or region
Records:	
Retention:	3 years (USCG) 5 years (EPA)
Location:	With OSC
Evaluation:	By Area Committee
Credit:	Plan holder should take credit for this exercise when conducted in conjunction with other exercises, as long as all exercise objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

1 B. Spill/SMFF Management Team Tabletop Exercise (TTX)

2 1. Area

Applicability:	Area SMT
Frequency:	Annually
Initiating Authority:	U.S. Coast Guard District or EPA Region
Participating Elements:	SMT for the area (USCG or EPA and respective response team) and State(s)
Scope:	Exercise the SMT's organization, communication, and decisionmaking in managing a spill and/or SMFF response.
Objectives:	<p>Exercise the SMT in a review of:</p> <ul style="list-style-type: none">A. Knowledge of the ACPB. Proper notificationsC. Communications systemD. Ability to access response equipmentE. Coordination of organization or agency personnel with responsibility for spill responseF. Ability to effectively coordinate spill and/or SMFF response activity with NRS infrastructureG. Ability to access information in ACP for location of sensitive areas, resources available within the area, unique conditions of the area, etc.H. Exercise the response management system identified in the ACP and, to the extent possible, the Unified CommandI. Minimum of one SMT TTX in a triennial cycle would involve simulation of a WCD scenario
Certification:	Self-certification
Verification:	Verification to be conducted by district or region
Records:	
Retention:	3 years (USCG) 5 years (EPA)
Location:	With OSC
Evaluation:	Self-evaluation
Credit:	Credit should be taken for this exercise when conducted in

conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill or SMFF response when these objectives are met, the response is evaluated, and a proper record is generated.

1 C. Equipment Deployment Exercises

2 1. Area

Applicability:	Area Committee
Frequency:	Annually
Initiating Authority:	OSC
Participating Elements:	Local area response community (appropriate Federal, State, and local response agencies)
Scope:	<p>Deploy and operate USCG and EPA "first aid" trailer response equipment and the Coast Guard's prepositioned VOSS/SORS equipment. All of the "first aid" trailer equipment or that which is necessary to respond to an AMPD in the area, whichever is less, should be deployed annually. VOSS equipment shall be deployed annually in sufficient numbers to ensure the qualification of all assigned response personnel. Joint exercises among several VOSS sites within a district are encouraged for efficiency and cost-effectiveness.</p> <p>All response personnel must be included in a comprehensive training program, and all response equipment in a comprehensive maintenance program. The intent is to ensure maximum preparedness of both response personnel and equipment via the most efficient means. Credit should be taken for deployment of equipment during training. The maintenance program must ensure that the equipment is periodically inspected and maintained in good operating condition in accordance with the manufacturer's recommendations and best commercial practices.</p>
Objectives:	<p>Demonstrate the ability of the response personnel to deploy and operate the equipment.</p> <p>Ensure that the response equipment is in proper working order.</p>
Certification:	Self-certification
Verification:	District or region
Records:	
Retention:	3 years (USCG) 5 years (EPA)
Location:	With OSC
Evaluation:	Self-evaluation

Credits:

Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

1 D. Area Exercises

2 1. Area

Applicability:	Area response community
Frequency:	Triennially (for each area)
Initiating Authority:	USCG, EPA, and industry
Participating Elements:	Appropriate Federal, State, and local government and industry and other members of the response community.
Scope:	Area exercises will exercise the area response community.
Objectives:	<p>Exercise the ACP, along with selected industry response plans.</p> <p>Exercise the response management system identified in the ACP and, to the extent possible, the Unified Command with the appropriate participants.</p> <p>Exercise the area and industry SMTs.</p> <p>Deploy adequate response equipment for the exercise scenario. At a minimum, the scenario must involve exercise of Tier I WCD capability.</p>
Format:	<p>Annual exercises would consist of the following:</p> <p>6 Government-led exercises</p> <p>14 industry-led exercises</p> <hr/> <p>Total = 20 area exercises per year</p> <p>A. Area exercises should be <i>approximately</i> 8–12 hours in duration.</p> <p>B. Exercise scenario is to be developed by the exercise design team.</p> <p>C. To simulate realism, the exercise should be conducted in the command post that would be utilized for a spill response, whenever possible.</p> <p>D. Exercise may be in real or limited compressed time and may start at any point during an incident, as determined by the exercise design team. Flexibility should be allowed to ensure that the exercise objectives are met.</p> <p>E. Lessons learned from the exercise shall be incorporated into each agency's PREP Lessons Learned System (e.g., CGSAILS), whenever possible.</p>
Certification:	The OSC will certify completion of the area exercise. In

certifying the area exercise, the OSC will consider the following:

- A.** Area exercise was conducted.
- B.** Area exercise met the objectives outlined in the PREP Guidelines.
- C.** Area response community was exercised for spill response preparedness.

Industry plan holders should take credit for all of the exercises completed during the area exercise. These exercises shall be self-certified by the plan holder.

Verification: Verification to be done by the NSCC

Records:

Retention: 3 years (USCG)

Location: With OSC

Evaluation: Joint evaluation team to be comprised of the Federal Government (USCG, EPA, PHMSA, or BSEE) State, and industry

Scheduling: Scheduling of area exercises will be done by the NSCC, utilizing input from the OSC, Area Committee, and RRT, in consultation with the industry. A multiyear schedule of PREP area exercises will be published on the USCG's HOMEPORT Web site (<https://homeport.uscg.mil>) as a public forum for Government and industry input into the scheduling process.

Scheduling: Scheduling of area exercises will be done by the NSCC, utilizing input from the OSC, Area Committee, and RRT, in consultation with the industry. A multiyear schedule of PREP area exercises will be published on the USCG's HOMEPORT Web site (<https://homeport.uscg.mil>) as a public forum for Government and industry input into the scheduling process.

APPENDIX A. RESPONSE PLAN CORE COMPONENTS

During each triennial cycle, all components of a plan holder's response plan must be exercised at least once. The purpose of this requirement is to ensure that all plan components function adequately for response to an oil spill.

The 15 core components listed below are the types of components that must be exercised. However, these components may not be contained in each response plan. As such, the plan holder shall identify those that are applicable from this list, adding or deleting as appropriate.

A. Notifications: Test the notifications procedures identified in the ACP and the associated Responsible Party Response Plan.

B. Staff Mobilization: Demonstrate the ability to assemble the spill response organization identified in the ACP and associated Responsible Party Response Plan.

C. Ability To Operate Within the Response Management System Described in the Plan:

1. Unified Command: Demonstrate the ability of the spill response organization to work within a Unified Command.

a. Federal Representation: Demonstrate the ability to consolidate the concerns and interests of the other members of the Unified Command into a unified strategic plan with tactical operations.

b. State Representation: Demonstrate the ability to function within the Unified Command structure.

c. Local Representation: Demonstrate the ability to function within the Unified Command structure.

d. Responsible Party Representation: Demonstrate the ability to function within the Unified Command structure.

2. Response Management System: Demonstrate the ability of the response organization to operate within the framework of the response management system identified in their respective plans.

a. Operations: Demonstrate the ability to coordinate or direct operations related to the implementation of action plans contained in the respective response and contingency plans developed by the Unified Command.

- 1 **b.** Planning: Demonstrate the ability to consolidate the various
2 concerns of the members of the Unified Command into joint
3 planning recommendations and specific long-range strategic
4 plans. Demonstrate the ability to develop short-range tactical
5 plans for the Operations Division.
- 6 **c.** Logistics: Demonstrate the ability to provide the necessary
7 support of both the short-term and long-term action plans.
- 8 **d.** Finance: Demonstrate the ability to document the daily
9 expenditures of the organization and provide cost estimates for
10 continuing operations.
- 11 **e.** Public Affairs: Demonstrate the ability to form a joint information
12 center and provide the necessary interface between the Unified
13 Command and the media.
- 14 **f.** Safety Affairs: Demonstrate the ability to monitor all field
15 operations and ensure compliance with safety standards.
- 16 **g.** Legal Affairs: Demonstrate the ability to provide the Unified
17 Command with suitable legal advice and assistance.
- 18 **D. Source Control:** Demonstrate the ability of the spill response organization to
19 control and stop the discharge at the source.
- 20 **1.** Salvage: Demonstrate the ability to assemble and deploy salvage
21 resources identified in the response plan for assessment and survey,
22 stabilization, and specialized salvage operations.
- 23 **2.** Firefighting: Demonstrate the ability to assemble and deploy the
24 firefighting resources identified in the response plan for assessment and
25 planning, and fire suppression.
- 26 **3.** Lightering: Demonstrate the ability to assemble and deploy the lightering
27 resources identified in the response plan.
- 28 **4.** Other Salvage Equipment and Devices (electrical and manual controls
29 and barriers to control the source): Demonstrate the ability to assemble
30 and deploy the other salvage devices identified in the response plan.
- 31 **E. Assessment:** Demonstrate the ability of the spill response organization to
32 provide an initial assessment of the discharge or potential discharge and
33 provide continuing assessments of the effectiveness of the tactical operations.
- 34 **F. Containment:** Demonstrate the ability of the spill response organization to
35 contain the discharge at the source or in various locations for recovery
36 operations.

1 **G. Recovery:** Demonstrate the ability of the spill response organization to
2 recover, mitigate, and remove the discharged product. Includes mitigation and
3 removal activities; e.g., dispersant use, ISB use, and bioremediation use.

4 1. On-Water Recovery: Demonstrate the ability to assemble and deploy the
5 on-water response resources identified in the response plans.

6 2. Shore-Based Recovery: Demonstrate the ability to assemble and deploy
7 the shoreside response resources identified in the response plans.

8 **H. Protection:** Demonstrate the ability of the spill response organization to
9 protect the environmentally and economically sensitive areas identified in the
10 ACP and the respective industry response plan.

11 1. Protective Booming: Demonstrate the ability to assemble and deploy
12 sufficient resources to implement the protection strategies contained in
13 the ACP and the respective industry response plan.

14 2. Water Intake Protection: Demonstrate the ability to quickly identify water
15 intakes and implement the proper protection procedures from the ACP or
16 develop a plan for use.

17 3. Wildlife Recovery and Rehabilitation: Demonstrate the ability to quickly
18 identify these resources at risk and implement the proper protection
19 procedures from the ACP to develop a plan for use.

20 4. Population Protection (Protect Public Health and Safety): Demonstrate
21 the ability to quickly identify health hazards associated with the
22 discharged product and the population at risk from these hazards, and to
23 implement the proper protection procedures from the ACP to develop a
24 plan for use.

25 **I. Disposal:** Demonstrate the ability of the spill response organization to dispose
26 of the recovered material and contaminated debris.

27 **J. Communications:** Demonstrate the ability to establish an effective
28 communications system for the spill response organization.

29 1. Internal Communications: Demonstrate the ability to establish an intra-
30 organization communications system. This encompasses
31 communications at the command post and between the command post
32 and deployed resources.

33 2. External Communications: Demonstrate the ability to establish
34 communications both within the response organization and other entities;
35 e.g., RRT, claimants, media, regional or HQ agency offices, and
36 nongovernmental organizations.

1 **K. Transportation:** Demonstrate the ability to provide effective multimode
2 transportation both for execution of the discharge and support functions.

3 1. Land Transportation: Demonstrate the ability to provide effective land
4 transportation for all elements of the response.

5 2. Waterborne Transportation: Demonstrate the ability to provide effective
6 waterborne transportation for all elements of the response.

7 3. Airborne Transportation: Demonstrate the ability to provide effective
8 airborne transportation for all elements of the response.

9 **L. Personnel Support:** Demonstrate the ability to provide the necessary support
10 of all personnel associated with the response.

11 1. Management: Demonstrate the ability to provide administrative
12 management of all personnel involved in the response. This requirement
13 includes the ability to move personnel into or out of the response
14 organization with established procedures.

15 2. Berthing: Demonstrate the ability to provide overnight accommodations
16 on a continuing basis for a sustained response.

17 3. Messing: Demonstrate the ability to provide suitable feeding
18 arrangements for personnel involved with the management of the
19 response.

20 4. Operational and Administrative Spaces: Demonstrate the ability to
21 provide suitable operational and administrative spaces for personnel
22 involved with the management of the response.

23 5. Emergency Procedures: Demonstrate the ability to provide emergency
24 services for personnel involved in the response.

25 **M. Equipment Maintenance and Support:** Demonstrate the ability to maintain
26 and support all equipment associated with the response.

27 1. Response Equipment: Demonstrate the ability to provide effective
28 maintenance and support for all response equipment.

29 2. Response Equipment: Demonstrate the ability to provide effective
30 maintenance and support for all equipment that supports the response.
31 This requirement includes communications equipment, transportation
32 equipment, administrative equipment, etc.

1 **N. Procurement:** Demonstrate the ability to establish an effective procurement
2 system.

3 1. Personnel: Demonstrate the ability to procure sufficient personnel to
4 mount and sustain an organized response. This requirement includes
5 insuring that all personnel have qualifications and training required for
6 their position within the response organization.

7 2. Response Equipment: Demonstrate the ability to procure sufficient
8 response equipment to mount and sustain an organized response.

9 3. Support Equipment: Demonstrate the ability to procure sufficient support
10 equipment to support and sustain an organized response.

11 **O. Documentation:** Demonstrate the ability of the spill response organization to
12 document all operational and support aspects of the response and provide
13 detailed records of decisions and actions taken.

APPENDIX B. ACRONYMS

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3	ACP	Area Contingency Plan
4	AMPD	average most probable discharge
5	BSEE	Bureau of Safety and Environmental Enforcement
6	CFR	Code of Federal Regulations
7	Co-Ops	Cooperatives (aka, OSRO)
8	COTP	Captain of the Port
9	EEZ	Exclusive Economic Zone
10	EPA	Environmental Protection Agency
11	FOSC	Federal On-Scene Coordinator
12	FRP	Facility Response Plan
13	FWPCA	Federal Water Pollution Control Act
14	GIUE	Government-Initiated Unannounced Exercise
15	HSEEP	Homeland Security Exercise and Evaluation Program
16	IAP	Incident Action Plan
17	ICS	Incident Command System
18	ISB	<i>In Situ</i> Burn
19	JIC	Joint Information Center
20	MODU	Mobile Offshore Drilling Unit
21	MMPD	Maximum Most Probably Discharge
22	MTR	Marine Transportation-Related
23	NCP	National Oil and Hazardous Substances Pollution Contingency Plan
24	NRS	National Response System
25	NRT	National Response Team

1	NSCC	National Schedule Coordination Committee
2	OPA90	Oil Pollution Act of 1990
3	OSC	On-Scene Coordinator
4	OSHA	Occupational Safety and Health Administration
5	OSRD	Oil Spill Response Division
6	OSRO	Oil Spill Removal Organization
7	OSRO	Oil Spill Response Organization (aka, Co-Op)
8	PHMSA	Pipeline and Hazardous Materials Safety Administration
9	PPE	Personal Protective Equipment
10	PREP	Preparedness for Response Exercise Program
11	QI	Qualified Individual
12	RP	Responsible Party
13	RRT	Regional Response Team
14	SMFF	Salvage and Marine Firefighting
15	SORS	Spilled Oil Recovery Systems
16	SMT	Spill Management Team
17	TAPAA	Trans-Alaska Pipeline Authorization Act
18	TTX	Tabletop Exercise
19	U.S.	United States
20	VOSS	Vessel of Opportunity Skimming System
21	VRP	Vessel Response Plan
22	WCD	Worst Case Discharge